

**MAYANK KHANDELWAL**  
Advocate

---

Through Registered Post/E-mail/WhatsApp

Date : 24.02.2026

To,

**Mr. Anil Kumar** (Advocate)

[Chamber No. 311 “E” Block Rajasthan High Court, Jaipur, Rajasthan - 302001]

**And**

**1. Mr. L.N. Chaudhry (Allen Mechu)** Resident of Vaishali Nagar, Jaipur, Rajasthan – 302021 Mobile No.: +91 7426060193

**2. Mr. Sandeep Sigar** Owner – Setup FX 44 Convention Tower, World Trade Center, Dubai Mobile No.: +91 9799107600 (Previous owner Company Pink City Jaipur)

**3. Mr. Ankit Agrawal** Owner WPS Technology S/o Mr. Rajesh Kumar 37, Nandpuri, Malviya Nagar, Jaipur, Rajasthan Mobile No.: +91 9460055704

**4. Mr. Tarun Mishra** Owner Webhence Innovations (Opc) Private Limited, Plot No5,7 First Floor SM, Tower 7 Teachers Colony, Vaishali Nagar, Jaipur, Jaipur, Rajasthan, India, 302021.

**5. Mr. Harsh Saini and Tarun Mishra** joint Director of PROFITHILLS EDUCATION PRIVATE LIMITED P.no. 7 Teachers Colony, Baba Market Dcm, Ajmer Road, Jaipur, Jaipur, Rajasthan, India, 302006

**MAYANK KHANDELWAL**  
Advocate

---

Dear Sir

Under instructions from and on behalf of my client Mr. Madhav Ram (Ronu), resident of Bharatpur, Rajasthan, I hereby issue this reply-cum-counter legal notice in response to your alleged legal notice dated 18.02.2026, sent on behalf of your client Mr. Allen Mechu. My client strongly denies each and every false, baseless, misleading, defamatory and fabricated allegation levelled against him in the said notice. The contents of your notice are not only factually incorrect but have been deliberately drafted with malafide intention to harass, threaten and malign my client's reputation in society.

1. That the contents of Para No. 1 of your notice are emphatically denied as false, self-serving and misleading. The alleged claim that your client is a "highly reputable and esteemed individual having impeccable reputation" is a matter of personal perception and self-assessment, and the same cannot be imposed upon the public at large.
  - a. It is submitted that reputation, if any, is subject to public conduct, transparency and lawful business dealings. If any aggrieved person raises questions or expresses grievances based on facts and material available in public domain, the same cannot automatically be termed as defamation.
  - b. My client has neither made any false statement nor fabricated any material. Any statement made by my client was based upon information received, documentary material and matters already

# MAYANK KHANDELWAL

Advocate

---

circulating in public domain, and was expressed in good faith without malafide intention.

- c. Mere assertion of “impeccable reputation” does not create immunity from public scrutiny, criticism or lawful questioning. In a democratic society governed by Article 19(1)(a) of the Constitution of India, fair comment and expression on matters of public concern is legally protected.
  - d. It is further denied that my client has made any unlawful attempt to tarnish the reputation of your client. On the contrary, the present notice appears to be an attempt to intimidate my client and suppress lawful expression by misuse of legal process.
2. That the contents of Para No. 2 of your notice are false, misleading, malicious and hence categorically denied. Your client has deliberately concealed the material fact that my client himself is a victim of the large-scale financial fraud committed through XPO and DGCX platforms.
- a. It is submitted that the said fraud has already been taken cognizance of by the Bharatpur Police, and the matter has been forwarded to higher investigating agencies including the Enforcement Directorate (ED) and Central Bureau of Investigation (CBI), where investigation and legal proceedings are presently underway.
  - b. My client has invested his hard-earned money in the said platforms and has suffered substantial financial loss. Being an aggrieved victim, my client has duly lodged written complaints and FIRs against XPO and DGCX at the concerned Bharatpur Police Station.

# MAYANK KHANDELWAL

Advocate

---

- c. My client is not a professional YouTuber, influencer, or content creator. He started sharing information through videos only after becoming a victim himself, with the sole objective of creating awareness and helping other affected investors.
  - d. The videos uploaded by my client are purely informative in nature, based on facts, documents and victim testimonies, and are intended to caution the public against fraudulent activities. At no point of time has my client promoted, advertised or encouraged any illegal platform, scheme or investment.
  - e. The statements made by my client are in public interest, in good faith, and protected under law. Such disclosure of financial frauds cannot be branded as “defamation” merely because it exposes the illegal activities of your client.
  - f. On the contrary, the present legal notice appears to be a calculated attempt to suppress genuine victims, obstruct investigation and deter whistleblowers from approaching authorities, which is impermissible in law.
3. That the contents of Para No. 3 of your notice are vehemently denied as false, exaggerated, self-serving and devoid of any legal foundation. My client has neither acted maliciously nor unlawfully at any point of time.
- a. It is denied that my client has caused any “irreparable” or “catastrophic” damage to your client’s reputation. Mere use of strong adjectives in a legal notice does not establish actual damage in the eyes of law unless supported by cogent evidence.

# MAYANK KHANDELWAL

Advocate

---

- b. My client reiterates that he himself is a victim of the financial fraud relating to XPO and DGCX platforms and has suffered monetary loss. He has duly approached the competent authorities and lodged complaints/FIRs in Bharatpur. His actions were taken in the capacity of an aggrieved investor and not with any intent to defame.
  - c. The videos referred to in your notice are informational and awareness-based in nature, intended to caution the public and assist other victims. They are based on facts, complaints and ongoing investigations already under consideration by law enforcement agencies.
  - d. It is a settled principle of law that truth spoken in public interest does not constitute defamation. Fair comment on matters involving financial fraud and public money is legally protected.
  - e. Your client has failed to specify any particular statement alleged to be false, nor has he produced any material proof to demonstrate actual reputational loss, business loss or causal nexus between my client's actions and any alleged damage.
  - f. On the contrary, the present allegations appear to be an attempt to intimidate a victim and silence legitimate grievance redressal, which amounts to misuse of legal process.
4. That the contents of Para No. 4 of your notice are wholly false, misleading, exaggerated and therefore vehemently denied. The allegations of "false, fabricated and malicious videos" are imaginary and unsupported by any credible evidence.

# MAYANK KHANDELWAL

Advocate

---

- a. It is deliberately suppressed by your client that my client is himself a victim of the large-scale XPO/DGCX financial fraud and has suffered substantial monetary loss. In this regard, FIR No. 0364 dated 01.12.2025, Police Station Bhusawar, District Bharatpur, stands registered under various penal provisions.
- b. It is further submitted that FIR No. 0363 dated 01.12.2025 at the same Police Station has also been registered in relation to the said fraud, wherein persons including L.N. Choudhary and others have been named as accused.
- c. My client, along with nearly four lakh affected investors, has been continuously pursuing legal remedies and cooperating with investigating agencies to ensure justice and punishment of the real offenders. His actions are in furtherance of law and public interest, and not for defamation of any individual.
- d. My client is not a professional YouTuber or influencer. After becoming a victim, he started sharing factual information only to create awareness among other victims and to assist authorities in investigation. The said videos are informational and precautionary in nature.
- e. At no point of time has my client promoted, advertised or encouraged any illegal platform, scheme or investment. On the contrary, he has consistently cautioned the public against fraudulent activities.
- f. The statements made by my client are based on FIRs, complaints, victim testimonies and ongoing investigations, and therefore cannot

**MAYANK KHANDELWAL**  
Advocate

---

be termed as “false” or “libellous” merely because they expose the wrongdoing of persons connected with the said fraud.

- g. It is denied that any alleged reputational damage has been caused by my client. If any adverse impression has arisen, the same is a direct consequence of the fraudulent activities under investigation and not due to any lawful disclosure made by my client.
  - h. The present allegations appear to be a deliberate attempt to intimidate a genuine victim and to obstruct the course of justice by misusing the process of law.
5. That the contents of Para No. 5 of your notice are false, exaggerated, speculative and hence categorically denied. The alleged claims of “catastrophic, irreparable and permanent injury” are imaginary and unsupported by any reliable or admissible evidence.
- a. Your client has failed to place on record any concrete material to show actual loss of reputation, business, social standing or goodwill allegedly suffered by him due to any act of my client.
  - b. It is reiterated that my client is himself an aggrieved victim of the XPO/DGCX fraud and has acted only in good faith, public interest and in pursuit of justice for himself and other affected persons.
  - c. The videos uploaded by my client are purely informational and awareness-oriented, intended to caution the public and assist investigating agencies, and not to ridicule, humiliate or target any individual.
  - d. Any public reaction, criticism or questioning faced by your client, if at all, is a natural consequence of ongoing criminal investigations and

# MAYANK KHANDELWAL

Advocate

---

public disclosures, and cannot be attributed to lawful and truthful disclosures made by my client.

- e. My client has neither instigated nor encouraged any form of harassment, ridicule, social boycott or ostracism against your client. Any such allegation is baseless and denied.
  - f. It is settled law that mere hurt feelings or subjective perception of embarrassment does not constitute legal defamation unless accompanied by proof of falsehood and malicious intent, which is conspicuously absent in the present case.
  - g. On the contrary, the present notice appears to be an attempt to create false victimhood and exert undue pressure upon my client to deter him from pursuing lawful remedies.
  - h. The claim that the alleged damage “cannot be compensated in monetary terms” is vague, rhetorical and legally untenable in absence of proof of actual loss.
6. That the contents of Para No. 6 of your notice are wholly false, imaginary, exaggerated and therefore vehemently denied. The allegations of “systematic”, “criminal” and “conspiratorial” conduct are reckless, baseless and made without any supporting material.
- a. It is categorically denied that my client has ever indulged in any continuous, calculated or malicious campaign against your client. My client has acted only as an aggrieved victim seeking justice and raising awareness about a large-scale financial fraud.
  - b. My client has neither fabricated nor manipulated any information. All statements made by him are based on FIRs, complaints, victim

# MAYANK KHANDELWAL

## Advocate

---

testimonies, documents and matters already under investigation by competent authorities.

- c. The allegation of “false information on various platforms” is vague and evasive, as your client has failed to identify any specific statement alleged to be false or misleading.
  - d. It is reiterated that my client is not a habitual content creator or professional YouTuber. His limited online activity is solely for the purpose of informing fellow victims and assisting law enforcement agencies.
  - e. There is no question of any “criminal conspiracy” or “premeditated design” on the part of my client. Such serious allegations have been casually made without invoking any competent judicial finding, thereby rendering them legally unsustainable.
  - f. The attempt to portray lawful disclosure of fraud and victim grievances as “heinous acts” reflects mala fide intention and abuse of legal process.
  - g. On the contrary, the persistent issuance of intimidating notices against a victim and whistleblower amounts to harassment and misuse of legal machinery.
  - h. My client reserves his right to initiate appropriate legal proceedings against your client for making reckless and defamatory allegations.
7. That the contents of Para No. 7 of your notice are denied as incorrect, speculative and misleading. My client has never, at any point of time, called upon the public to take any illegal, violent or unlawful action against your client.

# MAYANK KHANDELWAL

## Advocate

---

- a. It is submitted that none of the videos published by my client contain any language, statement or appeal which may amount to provocation, incitement or instigation under any penal law.
- b. My client has consistently advised viewers to approach lawful authorities, file complaints and seek remedies only through legal means, and has never encouraged mob action, harassment or intimidation.
- c. No complaint, FIR or legal proceeding has ever been initiated against my client by any authority alleging incitement, provocation or public disorder arising out of his videos.
- d. The investigating agencies dealing with the XPO/DGCX fraud have never found my client's conduct to be obstructive, unlawful or criminal in nature.
- e. The allegation that my client intended to cause "grave harm" to life, liberty or property is wholly imaginary and unsupported by any medical, police or judicial record.
- f. Your client has failed to cite even a single instance where any unlawful act was committed by any person at the behest of my client.
- g. It is submitted that exposing financial irregularities and sharing victim experiences cannot be equated with criminal intimidation or provocation under the Bharatiya Nyaya Sanhita, 2023.
- h. The present allegation appears to be an attempt to give a criminal colour to lawful whistleblowing and victim advocacy, which is impermissible in law.

**MAYANK KHANDELWAL**  
Advocate

---

8. That the contents of Para No. 8 of your notice are false, misconceived, legally untenable and hence categorically denied. The arbitrary and mechanical invocation of multiple penal provisions without establishing their essential ingredients is unlawful and amounts to misuse of legal process.

- a. With respect to Sections 356 and 357 of the Bharatiya Nyaya Sanhita, 2023 (relating to defamation), it is denied that my client has made any false statement with malafide intent. All statements made by my client are based on FIRs, victim complaints, documentary material and ongoing investigations, and are protected as fair comment made in public interest.
- b. With respect to Sections 351 and 351(2) of the Bharatiya Nyaya Sanhita, 2023 (relating to criminal intimidation and threat), it is denied that my client has ever threatened, coerced or intimidated your client in any manner whatsoever, either directly or indirectly.
- c. With respect to Section 352 of the Bharatiya Nyaya Sanhita, 2023 (intentional insult with intent to provoke breach of peace), it is denied that my client has used any abusive, insulting or provocative language capable of causing breach of peace.
- d. With respect to Section 61 of the Bharatiya Nyaya Sanhita, 2023 (criminal conspiracy), it is categorically denied that my client has entered into any agreement or arrangement with any person to commit any unlawful act. There is no meeting of minds or overt act attributable to my client.
- e. With respect to the provisions of the Bharatiya Suraksha Sanhita, 2023, it is submitted that the said statute primarily deals with

# MAYANK KHANDELWAL

Advocate

---

procedural aspects of criminal investigation and trial, and no substantive offence has been committed by my client thereunder.

- f. With respect to the Information Technology Act, 2000, it is denied that my client has published, transmitted or caused to be transmitted any obscene, offensive or illegal content. All materials uploaded are informational, lawful and in compliance with applicable digital laws.
  - g. None of the essential ingredients required to constitute offences under the aforesaid statutes are attracted in the present case, and no competent authority has initiated any criminal proceeding against my client in this regard.
  - h. Your client has failed to specify any particular statement, video or content which allegedly violates the said provisions, thereby rendering the allegations vague and unenforceable in law.
  - i. The present invocation of criminal provisions is a pressure tactic intended to harass and silence a genuine victim and whistleblower, and amounts to abuse of legal machinery.
  - j. My client reserves his right to seek appropriate legal remedies against such baseless and defamatory allegations.
9. That the contents of Para No. 9 of your notice are false, legally unsustainable, oppressive and are therefore categorically denied. The threatened claim of civil damages to the tune of Rs. 20,00,00,000/- (Rupees Twenty Crores) is arbitrary, vindictive and devoid of any legal or factual basis.
- a. It is pertinent to place on record that my client is a bona fide victim of a large-scale financial fraud and not an aggressor. FIR No. **0363 dated 01.12.2025** and FIR No. **0364 dated 01.12.2025**, Police Station

# MAYANK KHANDELWAL

Advocate

---

**Bhusawar, District Bharatpur**, stand duly registered in connection with the said fraud, wherein **L.N. Choudhary and others are named accused**.

- b. Once criminal law has been set into motion and named accused are facing investigation in registered FIRs, such accused persons cannot be permitted to misuse civil law as a shield to silence victims by issuing exorbitant and intimidating claims of damages.
- c. The law does not contemplate that an accused in a criminal case may first defraud victims and thereafter threaten those very victims with defamation and damages for merely raising their voice and cooperating with investigating agencies.
- d. If such a proposition is accepted, no victim of financial fraud, cheating or economic offence would ever dare to approach the police, lodge an FIR, or inform the public, for fear of retaliatory defamation suits by the accused.
- e. My client has not inflicted any “mental agony”, “torture” or “harassment” upon your client. On the contrary, my client himself has suffered severe financial loss, mental trauma and hardship as a direct result of the fraudulent acts under investigation.
- f. The alleged figure of Rs. 20 Crores is imaginary, inflated and concocted solely to terrorize my client and deter him from pursuing justice and supporting investigation in FIR Nos. 0363 and 0364.
- g. Your client has failed to demonstrate any lawful entitlement, computation, proof of loss or causal nexus to justify such an outrageous claim for damages.

# MAYANK KHANDELWAL

Advocate

---

- h. It is a settled principle of law that **truthful statements made by a victim in good faith, in connection with pending criminal proceedings and FIRs, do not constitute defamation** and cannot give rise to civil liability.
  - i. The present claim of damages is nothing but a **retaliatory SLAPP-style threat**, intended to browbeat, silence and financially exhaust a genuine victim and whistleblower.
  - j. My client categorically refuses to comply with your illegal and coercive demand and reserves his right to initiate appropriate civil and criminal proceedings against your client for intimidation, abuse of legal process and obstruction of justice.
10. That the contents of Para No. 10 of your notice are illegal, oppressive, intimidating and hence categorically denied. The so-called “stern, serious and final warning” is nothing but an empty threat intended to create fear and suppress lawful voice of victims.
- a. It is submitted that my client is neither part of any group, conspiracy, association nor acting in collusion with any person. He has acted independently, lawfully and in good faith as an aggrieved victim.
  - b. My client has not circulated any defamatory rumor, baseless allegation or false narrative. All statements made by him are supported by FIRs, complaints and ongoing investigations.
  - c. The attempt to issue blanket threats to unnamed “associates, conspirators and accomplices” reflects mala fide intention and amounts to harassment and criminal intimidation.

# MAYANK KHANDELWAL

Advocate

---

- d. Your client has no authority in law to issue general warnings to the public or to threaten criminal and civil action without due process of law.
  - e. The Constitution of India guarantees every citizen the right to approach authorities, share grievances and seek justice. Your client cannot override constitutional rights through private legal notices.
  - f. The repeated use of threatening language such as “severe consequences”, “imprisonment” and “heavy penalties” clearly demonstrates an attempt to unlawfully coerce and silence my client.
  - g. On the contrary, my client hereby places your client on notice that any further attempt to threaten, intimidate or obstruct him in pursuing his legal remedies shall compel my client to initiate appropriate proceedings for criminal intimidation, abuse of process and obstruction of justice.
  - h. My client remains committed to pursuing truth and justice through lawful means and shall not be deterred by such hollow and coercive warnings.
  - i. The present “final warning” is therefore rejected in toto as baseless, unlawful and unenforceable.
11. That the contents of Para No. 11 are illegal, coercive and unenforceable in law. The so-called “Final Legal Notice” and “Strict Call” are nothing but attempts to intimidate a bona fide victim and suppress lawful grievance redressal.
-

**MAYANK KHANDELWAL**  
Advocate

---

**Reply to Sub-Clause (a)**

*(Cease and desist from videos, allegations, awareness content etc.)*

- I. The demand to immediately cease and desist from publishing any videos or awareness content is unlawful and unconstitutional. My client is exercising his legal right to share factual information relating to registered FIRs and ongoing investigations.
  - II. My client has not provoked the public for any illegal act. He has consistently advised victims to approach police and lawful authorities only.
  - III. Therefore, the demand to stop lawful expression and awareness is rejected outright.
- 

**Reply to Sub-Clause (b)**

*(Remove all videos and content within 24 hours)*

- I. The demand to remove all videos, posts and materials within 24 hours is arbitrary and without legal basis.
  - II. Unless any competent court or lawful authority passes a specific order declaring any particular content illegal, my client is under no obligation to delete factual and lawful material.
  - III. No specific video, statement or timestamp has been identified as false or unlawful. Hence, the blanket demand is vague and untenable.
-

**MAYANK KHANDELWAL**  
Advocate

---

**Reply to Sub-Clause (c)**

*(Payment of Rs. 20 Crores as damages)*

- I. The demand of Rs. 20,00,00,000/- (Twenty Crores) as damages is imaginary, vindictive and intended to terrorize my client.
- II. FIR No. **0363 dated 01.12.2025** and FIR No. **0364 dated 01.12.2025**, Police Station Bhusawar, District Bharatpur, are already registered in relation to the financial fraud, wherein named accused persons are under investigation.
- III. An accused facing investigation cannot seek to silence victims through exaggerated civil claims.
- IV. No proof of actual financial loss, goodwill loss, or causal connection has been provided to justify such an inflated claim.
- V. The demand for payment is therefore rejected in toto.

---

**Reply to Sub-Clause (d)**

*(Public apology within 3 days)*

- I. The demand for a public apology is baseless and premature.
  - II. My client has neither admitted any wrongdoing nor has any competent authority held him guilty of defamation.
  - III. In absence of any judicial finding, demanding apology amounts to coercion and presumption of guilt without trial.
-

# MAYANK KHANDELWAL

Advocate

---

## Reply to Sub-Clause (e)

*(Notarized undertaking to never repeat alleged acts)*

- I. The demand for a notarized undertaking to never speak or publish in future is unconstitutional and violative of fundamental rights.
  - II. My client cannot be compelled to surrender his legal rights or pre-emptively accept liability for acts which are neither unlawful nor proven to be defamatory.
  - III. Such a demand amounts to prior restraint and suppression of lawful speech, which is impermissible under settled principles of law.
- 

## Final Position

- I. The entire Para 11 and its sub-clauses (a) to (e) are rejected as illegal, coercive and mala fide.
- II. My client reiterates that he is a victim seeking justice in connection with registered FIRs and shall continue to cooperate with investigating agencies and support other victims through lawful means.
- III. Any further attempt to threaten, intimidate or harass my client shall compel him to initiate appropriate civil and criminal proceedings for abuse of legal process and criminal intimidation.

That the contents of the concluding two pages of your notice prescribing compulsory compliance within seven days and threatening multiple proceedings

# MAYANK KHANDELWAL

## Advocate

---

are arbitrary, coercive, unconstitutional and hence denied. No private individual or his counsel has any authority in law to impose unilateral timelines, penalties or conditions without adjudication by a competent court. My client has not violated any law, order or judicial direction requiring compliance with your demands. The threat to initiate proceedings “without further notice or opportunity” is contrary to principles of natural justice and due process.

---

### **Reply to Proposed Action (i): Criminal Proceedings under BNS**

- a. With respect to the proposed complaint under Sections 356, 357, 351, 351(2), 352 and 61 of the Bharatiya Nyaya Sanhita, 2023, it is denied that any offence is made out against my client.
  - b. My client has neither defamed, intimidated, insulted nor conspired against your client. All statements made are based on registered FIRs, victim complaints and official records.
  - c. None of the mandatory legal ingredients of the said offences are satisfied in the present case.
- 

### **Reply to Proposed Action (ii): Proceedings under BSS and IT Act**

- a. With respect to the Bharatiya Suraksha Sanhita, 2023 and the Information Technology Act, 2000, it is denied that my client has committed any cyber offence.

# MAYANK KHANDELWAL

Advocate

---

- b. My client has not published any obscene, illegal, threatening or defamatory digital content.
  - c. No cyber authority has ever found any violation attributable to my client.
- 

## **Reply to Proposed Action (iii): Civil Suit for Rs. 20 Crores**

- a. The threatened civil claim of Rs. 20,00,00,000/- along with 18% interest is imaginary, exaggerated and unsupported by any documentary evidence.
  - b. Your client has failed to disclose any audited accounts, business records or valuation reports to justify such claim.
  - c. FIR No. 0363 and FIR No. 0364 dated 01.12.2025, Police Station Bhusawar, District Bharatpur, are already registered in relation to the fraud, wherein accused persons are under investigation.
  - d. Accused persons cannot lawfully intimidate victims through inflated damage claims.
- 

## **Reply to Proposed Action (iv): Injunction Application**

- a. The proposed application for permanent and mandatory injunction is premature and misconceived.
- b. Lawful sharing of facts relating to registered FIRs and investigations cannot be restrained except by judicial order.

# **MAYANK KHANDELWAL**

Advocate

---

- c. Prior restraint on victim advocacy and truthful disclosure is impermissible in law.
- 

## **Reply to Proposed Action (v): Cyber Crime Complaint**

- a. The threat to approach Cyber Crime Cell and Police Authorities is baseless and speculative.
  - b. My client has committed no cyber offence warranting registration of any FIR.
  - c. Any complaint made without factual foundation shall be liable to dismissal.
- 

## **Reply to Reservation of Rights and “Without Prejudice” Clause**

- I. The blanket reservation of rights and claims for mental agony, loss of livelihood and damages is vague and unsupported.
  - II. The phrase “without prejudice” cannot legitimize unlawful intimidation or abuse of legal process.
- 

## **Reply to Threat of Costs, Consequences and Maximum Punishment**

- I. The assertions regarding “sole risk”, “maximum punishment” and “severe consequences” are intimidatory and legally meaningless.

**MAYANK KHANDELWAL**  
Advocate

---

II. Liability and punishment can only be determined by a competent court after due trial.

---

**Final Response**

- I. The entire concluding portion of your notice is rejected as coercive, oppressive and devoid of legal merit.
- II. My client is a bona fide victim of financial fraud who has lawfully approached authorities and is cooperating with investigation.
- III. He shall continue to exercise his legal rights in accordance with law and shall not be deterred by retaliatory threats.
- IV. Any further attempt to harass, threaten or obstruct my client shall compel him to initiate appropriate proceedings for criminal intimidation, abuse of process and violation of constitutional rights.
- V. My client remains ready and willing to place all relevant material before any competent authority and is confident of his lawful conduct.

**Yours truly,**

*(Signature)*

**(MAYANK KHANDELWAL)**  
**ADVOCATE**

**Note:** A copy of this reply-cum-counter legal notice has been retained in my office for future reference and further necessary legal action, if required.