

Dinanath Tiwari and Associates

Advocates & Notary, Govt. of India

Gold Coin Premises, Vakola Pipe Line, Nehru Road, Santacruz (E), Mumbai - 400 055.

Tel: (R) 26672664, Telefax: 26672558, Cell: 9820973573

Email: dinanath27@rediffmail.com, dinanath27@gmail.com

Date: 16.11.2010

To,

Shri. Digvijay Singh,

115-117, South Avenue,

New Delhi-110011

Sir,

Under the instructions of our client. Shri Kirit Somaiya, having office at Vasant Smruti, Dadasaheb Phalke Marg, Dadar, Mumbai 400 014 we have to address you as follows:

1. Our client is a reputed social worker and political activist. Our client is All India secretary of Bhartiya Janata Party. He was member of Legislative Assembly Maharashtra State and the Member of Parliament (Loksabha).
2. Our client is a champion fighting for a cause of small investors and from time to time he has taken up various issues for the betterment of the masses including the cause of railway bomb blast victims at 7/11 at Mumbai. Our client has worked tirelessly in the matter of import of 'Wheat' and accordingly he has taken up various issues.
3. As a social and political activist our client enjoys great reputation amongst the masses and he is having a very clean image and he is known for his crusade against corruption.
4. Our client says that on 15.11.2010 you made false and baseless allegations against our client dragging his name in the "Stock Exchange

Scam ". As the General Secretary of Congress (I) you have made the false and baseless imputations against our client knowing the same to be false to your own knowledge.

5. You have made statement against our client which is posted by Indian Express on Monday November 15 and it is also aired by various TV channels.
6. Our client says that you have made the false, baseless, malicious, mala fide imputation in the TV channel and in the print media.
7. That, your said statement has been published in Indian Express where your imputation has been quoted. The said news is reproduced hereinafter:

*"Gadkari should disclose his assets: Congress
posted Mon Nov 15 2010, 16.06 hrs*

Accusing BJP of including in hypocrisy over the issue of corruption, Congress on Monday demanded that BJP president Nitin Gadkari should disclose his assets and sources of income.

"Gadkari should disclose where are the properties he had acquired in the last 10 to 15 years and his source of income. A high level inquiry should be done," party general secretary Digvijay Singh told reporters here.

He alleged, "Contrary to Congress, which had always been very sensitive on corruption, BJP has played a mute spectator to the corruption amongst its own high rank and file."

Unlike Congress, BJP had never taken any action against any of its senior leaders or ministers involved in corruption, he claimed.

"The BJP talks about corruption but its own leaders were indulged in corruption, including Chief Minister Yedurappa, who allotted land to his two sons, Sudhanshu Mittal who was involved in CWG corruption, Reddy Brothers, Kirit Somaiya who was accused in stock exchange scam or

former BJP president Bangaru Laxman and Dilip Singh Judev, who were caught on camera taking cash," he alleged.

8. Our client says that the entire imputation made by you is totally false, baseless, malicious and mala fide as our client is in no way connected with any stock exchange scams as falsely alleged by you.
9. Our client says that you have made the deliberate false and baseless statement to lower down the estimation of our client in the eyes of the right thinking persons in the society, knowing very well that our client is in no way connected with any stock exchange scams.
10. In the circumstances, by your false, baseless, malicious and mala fide imputations you have rendered yourself liable for prosecution under section 500 IPC and also for the damages under civil proceedings.
11. Our client has decided to give you an opportunity for tendering unconditional apology hence; you are hereby called upon to tender unconditional apology to our client within 24 hours from the time of receipt of this notice and get the apology published in all the concerned news papers and also get it aired on all the concerned electronic media.
12. Further kindly note that in the event of your failure our client will be constrained to initiate civil and/ or criminal proceedings against you in the proper court of law and the same will be entirely at your risk as to the cost and consequences thereof.



16/11/2010

For Dinanath Tiwari and Associates
Advocate