

Mahima Singh
ADVOCATE

24.09.2021

To,

Pharmacy Council of India
NBCC Centre, 3rd Floor,
Plot No.2, Community Centre,
Maa Anandamai Marg,
Okhla Phase - I
Landmark - (Near Hotel Crowne Plaza)
New Delhi – 110020

Delhi Pharmacy Council
Room No.198, Old Secretariat,
Civil Lines,
Delhi – 110054

Haryana Pharmacy Council
#49, Haripur 1st floor,
Behind State Bank of Patiala,
Sector-4, S.C.O. 87,
Panchkula – 134 109

Sub: Legal Notice to show cause that why civil and criminal legal action should not be taken against you for acting against law, for misleading and for causing grave harm and prejudice to students and their parents including spoiling their career by creating a website to falsely propagate that you have power under law to grant recognition/ approval to a statutory university and/ or to put statutory university name on the website whereas you have got no such power under law

Dear Sir,

Under instructions from and on behalf of my client, the undersigned students of Singhania University, Pacheri Bari, Dist. – Jhunjhunu, Rajasthan - 333515, and their parents ('Clients'), I do hereby serve you the addressee this legal notice as under:

1. That my Clients have approached the officers of State Pharmacy Councils several times for registration of the pass out students holding D. Pharma qualification from Singhania University, a statutory Indian University however, the said officers are denying registration under the pretext that the name of the said University has not been added on the website maintained by the Pharmacy Council of India.

Office – H. No. 355, Sec – 46, Faridabad, Haryana - 121010
Email – 26.mahima@gmail.com Mob. – +91-9818971908

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2. That at the outset, it is respectfully stated that the said ground is wholly without jurisdiction and against law as there is no provision which empowers Pharmacy Council to maintain website and names of universities. Rather all Indian Universities are already *de jure* recognised under Section 2(e) of the Pharmacy Act, 1948 and the Constitution of India and the act of the Pharmacy Council to maintain such a website and to spread such misinformation that it has power to recognised statutory Indian Universities is wholly without jurisdiction and against the directions of the Hon'ble Supreme Court in the case titled *Karnataka State Association of the Management of Nursing and Allied Health Science Institutions & Ors. v. Indian Nursing Council & Ors., Civil Appeal Nos. 12759-12761 of 2017* wherein the Hon'ble Court has expressly held that when the council has no authority to grant recognition, it is restrained from publishing materials on its website indicating that statutory university have to obtain recognition from the council and all such materials from which it could infer that recognition is to be obtained from the council stands withdrawn forthwith.
3. That the well settled legal position with respect to statutory university is as under:
 - i. Statutory universities are constitutional autonomous apex bodies for all education being empowered by authority of law i.e. the university Act and the UGC Act, 1956 to award degree/ diploma/ certificate in all courses. Statutory universities are separate and distinct from other non-statutory institutions/ colleges and is a class by itself recognised by the Constitution of India. Statutory universities are already empowered by authority of law i.e. Sections 12 and 22 of the UGC Act to impart education in courses including medical education and award degree/ diploma/ certificate there being no requirement of taking any recognition from any council or any other authority and such qualifications being awarded under authority of law are sui generis and self-validating for all intents and purposes. It is fundamental law that any action done under authority of law is valid for all intents and purposes. As such, degrees/ diplomas being awarded by statutory university by authority of law are automatically valid and have to be accepted for all intents and purposes, wherever such degrees/ diplomas are sought to be presented.
 - ii. Reference in this regard can be made to the decision passed by the Hon'ble Punjab & Haryana High Court, after following the decisions of the Hon'ble Supreme Court, in the case titled *Ms. Neelam Devi and Anr. vs. Haryana Nurses Registration Council & Ors., Civil Writ Petition No.4021/ 2009*. The said decision has attained finality and the relevant portion of the judgment is extracted hereinbelow for ready reference:

Office – H. No. 355, Sec – 46, Faridabad, Haryana - 121010
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“IV. Degree conferred by a University established under an enactment is sui generis and self validating

5....It may be that the State of Haryana did not recognize the degree or the Indian Nursing Council Act of 1947 itself does not provide for a recognition but if there is a University established under the Act of Parliament or a State legislature and the University existed till the Act was struck down by a decision of the Hon'ble Supreme Court, the degree obtained through such a University would require no recognition from anybody. The recognition comes through the very fact that the institute that awarded the degree is established under a University through an enactment.”

- iii. Reference can be made to the case titled '*Shyam Kumar Vyas & Ors. v. State of Rajasthan & Ors.*' reported in (2006) 47 AIC 310 decided by the Division Bench of the Hon'ble Rajasthan High Court. Relevant portion of the judgment is extracted hereinbelow for ready reference:

“11. Thus, as per the aforesaid decision any degree or diploma or post graduate degree granted by any University set up under a statute in India anywhere has to be accepted as a valid qualification for any purposes where such qualification is required and that cannot be ignored.”

- iv. That statutory universities are established by an Act of State Legislature under Entry 32 State List and recognised under Section 25 Concurrent List and Entries 44 and 66 Central List of Schedule VII of the Constitution of India, and its autonomy is guaranteed and protected under Entry 44 Central List Schedule VII to the Constitution of India. As stated above, statutory universities are separate and distinct class by itself.

“List II - 32. Incorporation, regulation and winding up of corporations, other than those specified in List I, and universities; unincorporated trading, literary, scientific, religious and other societies and associations; co-operative societies.

List III - 25. Education, including technical education, medical education and universities, subject to the provisions of entries 63, 64, 65 and 66 of List I; vocational and technical training of labour.

List I - 44. Incorporation, regulation and winding up of corporations, whether trading or not, with objects not confined to one State, but not including universities;

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List I - 66. Co-ordination and determination of standards in institutions for higher education or research and scientific and technical institutions.”

- v. In the landmark judgment of *T.M.A. Pai Foundation & Ors. V. State of Karnataka & Ors.* reported in (2002) 8 SCC 481, 11 judge Bench of the Hon'ble Apex Court held that education cannot be regulated and universities legal status in the field of education in equal to the State Government. The relevant portion of the judgment is extracted hereinbelow for ready reference:

“51. A University Education Commission was appointed on 4th November, 1948, having Dr. S. Radhakrishnan as its Chairman and nine other renowned educationists as its members. The terms of reference, inter alia, included matters relating to means and objects of university education and research in India and maintenance of higher standards of teaching and examining in universities and colleges under their control. In the report submitted by this Commission, in paras 29 and 31, it referred to autonomy in education which reads as follows:-

“University autonomy- Freedom of individual development is the basis of democracy. Exclusive control of education by the State has been an important factor in facilitating the maintenance of totalitarian tyrannies. In such States institutions of higher learning controlled and managed by Governmental agencies act like mercenaries, promote the political purposes of the State, make them acceptable to an increasing number of their population and supply them with the weapons they need. We must resist, in the interests of our own democracy, the trend towards the government domination of the educational process.

Higher education is, undoubtedly, an Obligation of the State but State aid is not to be confused with State control over academic policies and practices. Intellectual progress demands the maintenance of the spirit of free inquiry. The pursuit and practice of truth regardless of consequences has been the ambition of universalities. Their prayer is that of the dying Goethe: More light, or that of Ajax in the mist “Light, though, I perish in the light.

The respect in which the universities of Great Britain are held is due to the freedom from governmental interference which they enjoy constitutionally and actually. Our universities should be released from the control of politics.

Liberal education- All education is expected to be liberal. It should free us from the shackles of ignorance, prejudice and unfounded belief. If we are incapable of achieving the good life, it is due to faults in our inward being, to the darkness in us. The process of education is the slow conquering of this darkness. To lead us from darkness to light, to

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free us from every kind of domination except that of reason, is the aim of education.

52. There cannot be a better exposition than what has been observed by these renowned educationists with regard to autonomy in education. The aforesaid passage clearly shows that the governmental domination of the educational process must be resisted. Another pithy observation of the Commission was that State aid was not to be confused with State control over academic policies and practices. The observations referred to hereinabove clearly contemplate educational institutions soaring to great heights in pursuit of intellectual excellence and being free from unnecessary governmental controls."

- vi. Education as a subject matter is provided in the Concurrent List under Entry 25 and has been made subject to Entry 66 of the Central List. Under Entry 66 of the Central List, Parliament has enacted a special legislation for coordination and determination of standards in university education i.e. the UGC Act. The entire gamut of university education comes under the Central Act i.e. the UGC Act which is the specific and special legislation for university education and overrides all other legislations with respect to university education. Since university education is a central subject under Entry 66 Central List read with the UGC Act which is special law enacted by the Parliament for coordination and determination of standards of university education, provisions of the UGC Act will prevail over and override all other laws of Centre and State in this regard. Reference can be made to the decision of the Hon'ble Supreme Court in the case titled *Maharshi Mahesh Yogi Vedic Vishwavidyalaya v. State of M.P. & Ors.* reported in (2013) 15 SCC 677. The relevant portion of the judgment is extracted hereinbelow for ready reference:

"102. This Court in Prof. Yashpal and Anr. (supra) held in paragraphs 28, 33 and 34 as under:

28. Though incorporation of a university as a legislative head is a State subject (Entry 32 List II) but basically a university is an institution for higher education and research. Entry 66 of List I is coordination and determination of standards in institutions for higher education or research and scientific and technical institutions. There can thus be a clash between the powers of the State and that of the Union. The interplay of various entries in this regard in the three lists of the Seventh Schedule and the real import of Entry 66 of List I have been examined in several decisions of this Court. In Gujarat University v. Krishna Ranganath Mudholkar a decision by a Constitution Bench rendered prior to the Forty-second Amendment when Entry 11 of List

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It was in existence, it was held that Items 63 to 66 of List I are carved out of the subject of education and in respect of these items the power to legislate is vested exclusively in Parliament. The use of the expression "subject to" in Item 11 of List II of the Seventh Schedule clearly indicates that the legislation in respect of excluded matters cannot be undertaken by the State Legislatures. In AIR para 23, the Court held as under: (SCR pp. 137-38)

Power of the State to legislate in respect of education including universities must to the extent to which it is entrusted to the Union Parliament, whether such power is exercised or not, be deemed to be restricted. If a subject of legislation is covered by Items 63 to 66 even if it otherwise falls within the larger field of 'education including universities' power to legislate on that subject must lie with Parliament. ... Item 11 of List II and Item 66 of List I must be harmoniously construed. The two entries undoubtedly overlap: but to the extent of overlapping, the power conferred by Item 66 List I must prevail over the power of the State under Item 11 of List II. It is manifest that the excluded heads deal primarily with education in institutions of national or special importance and institutions of higher education including research, sciences, technology and vocational training of labour.

33. The consistent and settled view of this Court, therefore, is that in spite of incorporation of universities as a legislative head being in the State List, the whole gamut of the university which will include teaching, quality of education being imparted, curriculum, standard of examination and evaluation and also research activity being carried on will not come within the purview of the State Legislature on account of a specific entry on coordination and determination of standards in institutions for higher education or research and scientific and technical education being in the Union List for which Parliament alone is competent. It is the responsibility of Parliament to ensure that proper standards are maintained in institutions for higher education or research throughout the country and also uniformity in standards is maintained.

34. In order to achieve the aforesaid purpose, Parliament has enacted the University Grants Commission Act. First para of the Statement of Objects and Reasons of the University Grants Commission Act, 1956 (for short "the UGC Act") is illustrative and consequently it is being reproduced below:

The Constitution of India vests Parliament with exclusive authority in regard to 'coordination and determination of standards in institutions for higher education or research and scientific and technical institutions'. It is obvious that neither coordination nor determination of standards is possible unless the Central Government has some voice

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in the determination of standards of teaching and examination in universities, both old and new. It is also necessary to ensure that the available resources are utilised to the best possible effect. The problem has become more acute recently on account of the tendency to multiply universities. The need for a properly constituted Commission for determining and allocating to universities funds made available by the Central Government has also become more urgent on this account.

107. In our considered opinion, Section 12 of the University Grants Commission Act, 1956 would encompass apart from determining the course contents with reference to which the standard of teaching and its maintenance is to be monitored by the University Grants Commission, would also include the infrastructure that may be made available, either in the University or in other campuses, such as the centers, in order to ensure that such standard of education, teaching and examination, as well as research are maintained without any fall in standard. Therefore, while upholding the conclusion of the Division Bench that it is beyond the legislative competence of the State Legislature to stipulate any restriction, as regards the conduct of the courses by getting the approval of the State Government, in the same breath, such lack of competence would equally apply to the running of the centers as well."

4. Singhania University is a constitutional statutory body established by an Act of State Legislature viz. Singhania University Pachheri Bari (Jhunjhunu) Act, 2008 ("State Act") which received the assent of the Hon'ble Governor of Rajasthan on 29.03.2008 and is in force with effect from 21.10.2007. Singhania University is an Indian University recognised under Section 2(e) of the Pharmacy Act and also under the UGC Act, 1956 ("UGC Act").
5. That Singhania University being a statutory university is a separate and distinct entity from non-statutory institution, the entire gamut of Singhania University education is exclusively governed by the provisions of the UGC Act which is the special Act for university education. Section 22 read with Sections 12A and 14 of the UGC Act read with the State Act empowers Singhania University to impart education and award degrees/ diplomas in all education without their being any restriction or qualification. As such, Singhania University is empowered by authority of law to impart education and award degree, diploma, certificate in pharmacy courses there being no requirement to take any further approval or recognition.
6. The Hon'ble Supreme Court of India has held in a catena of judgments that Right to Education is a Fundamental Right guaranteed under Articles 14, 19 and 21 of the Constitution of India and it is the Fundamental Right of the students to receive education from any university of their choice and at any

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place of their convenience. Causing any obstruction or interference in functioning of a statutory university shall amount to an infringement of the Fundamental Right guaranteed under the Constitution of India. Reference in this regard can be made to the judgment passed by the Hon'ble Apex Court in the case of *Maharshi Mahesh Yogi Vishwavidyalaya Vs. State of Madhya Pradesh* reported in (2013) 15 SCC 677, in which the Hon'ble Court held as under:

"80. Having regard to our fundamental approach to the issue raised in this appeal and our conclusion as stated above, we are convinced that the arguments based on the Legislative competence also pales into insignificance. Even without addressing the said question, we have in as much found that by virtue of the amendment introduced to Section 4(1), an embargo has been clearly created in one's right to seek for education, which is a Constitutionally protected Fundamental Right. Therefore, there was a clear violation of Articles 14 and 21 of the Constitution and consequently, such a provision by way of an amendment cannot stand the scrutiny of the Court of Law. To support our conclusion, we wish to refer to the following decisions rendered by this Court, right from Mohini Jain case, viz.,

(i) Society for Unaided Private Schools of Rajasthan v. Union of India - (2012) 6 SCC 1

(ii) Bhartiya Seva Samaj Trust v. Yogeshbhai Ambalal Patel - (2012) 9 SCC 310

(iii) State of T.N. v. K. Shyam Sunder (2011) 8 SCC 737

(iv) Satimbla Sharma v. St. Paul's Sr. Sec. School (2011) 13 SCC 760

(v) Ashoka Kumar Thakur v. Union of India - (2008) 6 SCC 1;

wherein, this Court has consistently held that Right to Education is a Fundamental Right. Thus, our conclusion is fortified by the various judgments of this Court, wherein, it has been held that imparting of education is a Fundamental Right, in as much as, we have held that the establishment of the appellant University was mainly for the purpose of imparting education, while promotion of Vedic learning is one of the primary objectives of the University. Any attempt on the part of the State to interfere with the said main object viz., imparting of education, would amount to an infringement of the Fundamental Right guaranteed under the Constitution.

7. That there is no provision in the Pharmacy Act nor there can be any provision in the Pharmacy Act which empowers Pharmacy Council to recognize Indian university as universities are already recognized and empowered by authority

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of law. Further, as held by the Hon'ble Supreme Court, any attempt to interfere with the object of statutory university i.e. imparting of education, would amount to an infringement of the Fundamental Right guaranteed under the Constitution. This is fortified by Entry 44 of List I of Schedule 7 to the Constitution of India which protect and guarantees autonomy of universities and provides that the Centre does not have the legislative competence to regulate universities. Therefore, no such power can be given to Pharmacy Council.

8. It is respectfully submitted that the Pharmacy Council is without jurisdiction, illegally and for oblique and malafide reasons publishing materials on its website and spreading misinformation that statutory universities require recognition from the Pharmacy Council to impart education and award degrees/ diplomas and certificates and without its recognition, degrees/ diplomas/ certificates of statutory universities are not valid and not eligible for registration. Rather Section 31 of the Pharmacy Act specifically provides that a person who holds degree/ diploma from an Indian University shall be entitled to have his name entered in the register.
9. The Parliament has enacted the National Medical Commission Act, 2019 ("NMC Act") to provide for medical education system and medical degree/ diploma/ certificates awarded by Singhania University are recognised medical qualifications under Section 35 of the NMC Act which provides as under:

35. Recognition of medical qualifications granted by Universities or medical institutions in India.—(1) The medical qualification granted by any University or medical institution in India shall be listed and maintained by the Under-Graduate Medical Education Board or the Post-Graduate Medical Education Board, as the case may be, in such manner as may be specified by the regulations and such medical qualification shall be a recognised medical qualification for the purposes of this Act."
10. The Ministry of Education, Government of India has vide Circular No.P.26/4/52 C.C. dated 20.09.1952, to give effect to Section 25 of the UGC Act, has categorically directed that the degrees/diplomas awarded by universities in India incorporated by an act of the central or state legislature in India stand automatically recognised.
11. The Higher Education Department, Government of Rajasthan vide Circular dated 03.11.1999 has also expressly directed that the qualifications awarded by the universities established under the Central or the State Act shall automatically stand automatically recognised and there is no requirement for any other recognition.

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12. It is wholly preposterous and defaming of the officials of you the addressee to deny registration to my Clients. It is respectfully submitted that as per the applicable law, the denial of registration to my Clients tantamount to infringement of the fundamental rights guaranteed under Article 14, 19 and 21 of the Constitution of India and instilling panic and fear amongst the students and their parents and also defaming the university. As such, the concerned officers of you the addressee are liable for acting against law and to be punished for causing injury to my Clients.
13. That the action of your officers, without taking into consideration relevant facts and applicable laws and taking into consideration irrelevant facts and non-existent laws, is in violation of Article 14 of the Constitution of India and suffers from lack of jurisdiction and is nullity and non-est. As held by the Hon'ble Apex Court in a number of cases that any action taken by an authority without jurisdiction is nullity and void ab initio. Reference in this regard can be made to the judgment of the Hon'ble Apex Court in the case of **Dr. Jagmittar Sain Bhagat v. Dir. Health Services, Haryana and Ors.** reported in **AIR 2013 SC 3060** wherein the Hon'ble Court held as under:

"7. Indisputably, it is a settled legal proposition that conferment of jurisdiction is a legislative function and it can neither be conferred with the consent of the parties nor by a superior Court, and if the Court passes a decree having no jurisdiction over the matter, it would amount to nullity as the matter goes to the roots of the cause. Such an issue can be raised at any stage of the proceedings. The finding of a Court or Tribunal becomes irrelevant and unenforceable/in executable once the forum is found to have no jurisdiction. Similarly, if a Court/Tribunal inherently lacks jurisdiction, acquiescence of party equally should not be permitted to perpetuate and perpetrate, defeating the legislative animation. The Court cannot derive jurisdiction apart from the Statute. In such eventuality the doctrine of waiver also does not apply. (Vide: United Commercial Bank Ltd. v. Their Workmen MANU/SC/0067/1951 : AIR 1951 SC 230; Smt. Nai Bahu v. Lal Ramnarayan and Ors. MANU/SC/0367/1977 : AIR 1978 SC 22; Natraj Studios (P) Ltd. v. Navrang Studios and Anr. MANU/SC/0477/1981 : AIR 1981 SC 537; and Kondiba Dagadu Kadam v. Savitribai Sopan Gujar and Ors. MANU/SC/0278/1999 : AIR 1999 SC 2213).

...9. Law does not permit any court/tribunal/authority/forum to usurp jurisdiction on any ground whatsoever, in case, such a authority does not have jurisdiction on the subject matter. For the reason that it is not an objection as to the place of suing;, "it is an objection going to the nullity of the order on the ground of want of jurisdiction". Thus, for assumption of jurisdiction by a court or a tribunal, existence of jurisdictional fact is a condition precedent. But once such

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jurisdictional fact is found to exist, the court or tribunal has power to decide on the adjudicatory facts or facts in issue. (Vide: Setrucharlu Ramabhadra Raju Bahadur v. Maharaja of Jeypore MANU/PR/0093/1919 : AIR 1919 PC 150; State of Gujarat v. Rajesh Kumar Chimanlal Barot and Anr. MANU/SC/0672/1996 : AIR 1996 SC 2664; Harshad Chiman Lal Modi v. D.L.F. Universal Ltd. and Anr. MANU/SC/0710/2005: AIR 2005 SC 4446; and Carona Ltd. v. Parvathy Swaminathan and Sons MANU/SC/3938/2007 : AIR 2008 SC 187)."

14. It is respectfully submitted that as per law, all public officers are bound to act fairly, lawfully and justly and by denying registration of my Clients without considering the relevant laws, your action tantamount to various punishable offences including but not limited to offences under Sections 166, 167, 409, 463, 499 IPC which provide as under:-

Section 166 - Public servant disobeying law, with intent to cause injury to any person :-

Whoever, being a public servant, knowingly disobeys any direction of the law as to the way in which he is to conduct himself as such public servant, intending to cause, or knowing it to be likely that he will, by such disobedience, cause injury to any person, shall be punished with simple imprisonment for a term which may extend to one year, or with fine, or with both. (Non- Cognizable)

Section 167 - Public servant framing an incorrect document with intent to cause injury:-

Whoever, being a public servant, and being, as such public servant, charged with the preparation or translation of any document or electronic record, frames, prepares or translates that document or electronic record in a manner which he knows or believes to be incorrect, intending thereby to cause or knowing it to be likely that he may thereby cause injury to any person, shall be punished with imprisonment of either description for a term which may extend to three years, or with fine, or with both. (Cognizable)

Section 409 - Criminal breach of trust by public servant, or by banker, merchant or agent:-

Whoever, being in any manner entrusted with property, or with any dominion over property in his capacity of a public servant or in the way of his business as a banker, merchant, factor, broker, attorney or agent, commits criminal breach of trust in respect of that property, shall be punished with I [imprisonment for life], or with imprisonment of either description for a term which may extend to ten years, and shall also be liable to fine. (Cognizable)

Section 463 – Forgery :-

Office – H. No. 355, Sec – 46, Faridabad, Haryana - 121010
Email – 26.mahima@gmail.com Mob. – +91-9818971908

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Whoever makes any false documents or false electronic record or part of a document or electronic record with intent to cause damage or injury], to the public or to any person, or to support any claim or title, or to cause any person to part with property, or to enter into any express or implied contract, or with intent to commit fraud or that fraud may be committed, commits forgery.

Section 464 - Making a false document :-

A person is said to make a false document or electronic record -

First- Who dishonestly or fraudulently – makes, signs, seals or executes a document or part of a document; makes, signs, seals or executes a document or part of a document; makes or transmits any electronic record or part of any electronic record; affixes any electronic signature on any electronic record; makes any mark denoting the execution of a document or the authenticity of the electronic signature, with the intention of causing it to be believed that such document or part of document, electronic record or electronic signature was made, signed, sealed, executed, transmitted or affixed by or by the authority of a person by whom or by whose authority he knows that it was not made, signed, sealed, executed or affixed; or

Secondly.--Who without lawful authority, dishonestly or fraudulently, by cancellation or otherwise, alters a document or an electronic record in any material part thereof, after it has been made, executed or affixed with electronic signature either by himself or by any other person, whether such person be living or dead at the time of such alteration; or

Thirdly.--Who dishonestly or fraudulently causes any person to sign, seal, execute or alter a document or an electronic record or to affix his electronic signature on any electronic record knowing that such person by reason of unsoundness of mind or intoxication cannot, or that by reason of deception practised upon him, he does not know the contents of the document or electronic record or the nature of the alteration.

Section 465 – Punishment for forgery :-

Whoever commits forgery shall be punished with imprisonment of either description for a term which may extend to two years, or fine or with both. (Non-Cognizable)

Section 499 – Defamation :-

Whoever, by words either spoken or intended to be read, or by signs or by visible representations, makes or publishes any imputation concerning any person intending to harm, or knowing or having reason to believe that such imputation will harm, the reputation of such person, is said, except in the cases hereinafter expected, to defame that person.

Office – H. No. 355, Sec – 46, Faridabad, Haryana - 121010
Email – 26.mahima@gmail.com Mob. – +91-9818971908

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Explanation 1 - It may amount to defamation to impute anything to a deceased person, if the imputation would harm the reputation of that person if living, and is intended to be hurtful to the feelings of his family or other near relatives.

Explanation 2 - It may amount to defamation to make an imputation concerning a company or an association or collection of persons as such.

Explanation 3 - An imputation in the form of an alternative or expressed ironically, may amount to defamation.

Explanation 4 - No imputation is said to harm a person's reputation, unless that imputation directly or indirectly, in the estimation of others, lowers the moral or intellectual character of that person, or lowers the character of that person in respect of his caste or of his calling, or lowers the credit of that person, or causes it to be believed that the body of that person is in a loathsome state, or in a state generally considered as disgraceful.

In the circumstances, I am constrained to issue the present legal notice instructing you to immediately register my Clients and remove the website which is being maintained without jurisdiction within a time period of 15 (fifteen) days from the receipt of this notice, failing which our Client shall be constrained to initiate civil and criminal legal proceedings including recovery of damages, against you and all concerned, and in that event you shall be responsible for all costs, risks and responsibilities.

Yours Sincerely,



Mahima Singh
Advocate (D/8984/2018)

CC for information and necessary action:

1. **Shri Dharmendra Pradhan**
Hon'ble Education Minister,
minister.sm@gov.in
pstosm@gov.in
302-C, Shastri Bhawan,
New Delhi.
2. **Shri Kiren Rijju**
Hon'ble Law Minister,
mljoffice@gov.in
Ministry of Law and Justice,

Office - H. No. 355, Sec - 46, Faridabad, Haryana - 121010
Email - 26.mahima@gmail.com Mob. - +91-9818971908

Mahima Singh
ADVOCATE

4th Floor, A-Wing,
Shastri Bhawan,
New Delhi - 110001

Office – H. No. 355, Sec – 46, Faridabad, Haryana - 121010
Email – 26.mahima@gmail.com Mob. – +91-9818971908

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S. No.	Name of Student	Signature
1.	VICKEY	Vicky
2.	LAKSHAY	Lakshay
3.	Priyanka	Priyanka
4.	NEERAJ	Neeraj
5.	KAPIL KAJLA	Kapil
6.	CHANCHAL KUMAR	Chanchal

Office - H. No. 355, Sec - 46, Faridabad, Haryana - 121010
Email - 26.mahima@gmail.com Mob. - +91-9818971908