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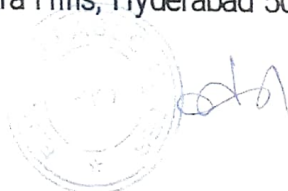
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June 19, 2024  
Hyderabad

**LEGAL NOTICE**  
**RLAD**

To

1. Sri Padi Koushik Reddy,  
S/o.Padi Sainath Reddy,  
Aged about : 39 years,  
Occ : Member of Legislative Assembly (MLA-BRS),  
R/o. H.No.1-38, Veena vanka village,  
Veena Vanka Mandal, Karimnagar District,  
Telangana.
2. T-News Channel,  
Represented by its Managing Director,  
Second Floor, Telangana Bhavan,  
Road No 10, Banjara Hills, Hyderabad - 500034
3. Sri Joginapally Santosh Kumar,  
Managing Director & Ex-Member of Parliament-BRS,  
T-News Channel,  
Second Floor, Telangana Bhavan,  
Road No 10, Banjara Hills, Hyderabad – 500034
4. Telangana Broadcasting Pvt Ltd.,  
Represented by its Managing Director,  
Second Floor, Telangana Bhavan,  
Road No 10, Banjara Hills, Hyderabad – 500034
5. Namaste Telangana,  
Telugu Daily News Paper,  
Represented by its Editor in Chief,  
# 8-2-603/1/7,8 & 9, Krishnapuram,  
Road No. 10, Banjara Hills, Hyderabad 500 034



6. Sri Thigulla Krishna Murthy,  
Chief Editor,  
Namaste Telangana Telugu Daily News Paper,  
# 8-2-603/1/7,8 & 9, Krishnapuram,  
Road No. 10, Banjara Hills, Hyderabad 500 034
7. Telangana Publications Private Limited,  
Rep by its Managing Director,  
# 8-2-603/1/7,8 & 9, Krishnapuram,  
Road No. 10, Banjara Hills, Hyderabad 500 034

**SUBJECT** : Notice of Defamation in respect of press conference given by the 1<sup>st</sup> of you to Press & Television Media Houses on 08.06.2024 & 11.06.2024 which were telecasted by the 2<sup>nd</sup> to 7<sup>th</sup> of you.

\* \* \*

Under the instructions from and on behalf of our client **SRI PONNAM PRABHAKAR**, S/o.Late Sathaiah, Aged about : 57 years, Occ : Member of Legislative Assembly (MLA-INC), R/o.H.No.7-2-991, Ponnam Complex, Karimnagar, hereinafter referred to as "our client" we hereby serve you legal notice as under:

1. Our client states that, he is a social conscious citizen and an active politician and is a member of Indian National Congress. He was elected as Member of Legislative Assembly (MLA) from Husnabad Constituency, Karimnagar District, Telangana State in the General Elections that were held in 2023 and is currently serving as Minister of Transport and BC Welfare in the State of Telangana.



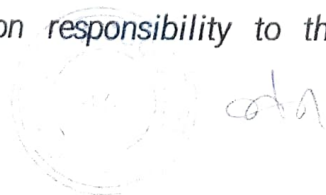
2. Our client further states that, he dedicated his life to public service and has always conducted himself with the utmost integrity, honesty, and dedication to the welfare of the public. Over the years, he has maintained an impeccable record of service and has been recognized by the public for his contributions. His reputation has been built on the foundation of transparency, ethical conduct, and unwavering commitment to the principles of justice and fairness.
3. Our Client states that, he participated in various social activities from a very young age. He was elected Union President of SRR Government Degree and PG College during 1987-1988. He served as district General Secretary of National Students' Union of India (NSUI) from 1987 to 1989. He was also the Convenor of the District Colleges of Karimnagar from 1987 to 1988. He held the position of NSUI State Secretary from 1989 to 1991 and followed by District President of NSUI from 1992 to 1998. He later was elected again as NSUI State President from 1999 to 2002. He worked as General Secretary of State Youth Congress from 2002 to 2003 and then, worked as Pradesh Congress Committee Media Cell Coordinator from 2002 to 2004. He was made DCMS President and later Chairman of State Markfed. He was elected from Karimnagar as Member of Parliament to enter 15th Lok- Sabha in 2009 on Indian National Congress (INC) ticket. He was a member for various parliamentary committees. He was one of the active participants in Telangana Movement.
4. Our client further states that, while he holds a good position, reputation, honor, respect, dignity, prestige, command, name and fame in the society among the family, friends, general public, political circle which he has painstakingly built for several years, to his utter surprise, shock and





dismay, the 1<sup>st</sup> of you have levelled false, baseless, scandalous and obnoxious allegations against him in the press conference that was conducted by you on 08.06.2024 and 11.06.2024, and also in your 'Facebook' account and 'Instagram' posts/videos, through which you have alleged as under :

*"The Transport Minister Ponnambal Prabhakar is involved in a scam of Rs.100 crores and is directly involved in illegal transportation of fly ash from the National Thermal Power Corporation (NTPC). He is threatening the officials. Due to his involvement, the officials are not taking any action against my complaint. I myself have caught 12 lorries which were overloaded with fly-ash. But officials have only taken action against two lorries and released other 10 lorries. As we are catching lorries going through Huzurabad, they are now going through Husnabad, which is the constituency of the Minister. This proves his involvement in the scam. All my complaints to RTA, NTPC-ED are ignored. Lorries carrying fly-ash are overloaded and are carrying twice the permitted limit. The way-bills do not disclose the weight of the lorry. 16 tyre lorry is permitted to carry 36 tons and 14 tyre lorry is permitted to carry 32 tons. But then 72 tons of fly ash is being transported per lorry. Expenditure incurred for transporting 32 tons per lorry is about 30 thousand. But by overloading it by twice the transporter is gaining 30 thousand per lorry. On 300 lorries that carry fly-ash, transporters save about 90 lakhs per day. 40 lakhs goes to various officers and **50 lakhs per day goes directly to the Minister, which if calculated from the day he took charge as the Minister, would be Rs.100 crores.** At the instance of the Minister, the transporter/contractor agreed to give the transportation responsibility to the one suggested by the*



*Minister. At this juncture, the family members of the Minister entered and Mr. Anup, who is Ministers elder brother's son is the collection boy. And therefore the Minister has to be suspended from the Cabinet"*

5. Our client further states that, the above said allegations which are levelled by the 1<sup>st</sup> of you are false, baseless, malicious and our client specifically denies all the above said allegations being far from truth These allegation are made solely with an intention to malign our client, to cause damage to his reputation and without any admissible evidence. The 2<sup>nd</sup> to 4<sup>th</sup> of you telecasted it on the same day i.e. on 08.06.2024 & 11.06.2024 and the 5<sup>th</sup> to 7<sup>th</sup> of you has printed and published in your daily newspaper on the next day i.e. on 09.06.2024 and 12.06.2024 without even verifying its credentials or truth of it.
6. Our client further states that, the allegations levelled by the 1<sup>st</sup> of you which were telecasted and published by the 2<sup>nd</sup> to 7<sup>th</sup> of you, does not reflect the true and correct facts and are not based on any evidence. The said allegations are made with malafide and malicious intentions and it can be understood that the baseless allegations levelled by the 1<sup>st</sup> of you which were telecasted and published by the 2<sup>nd</sup> to 7<sup>th</sup> of you are with a sole intention to tarnish, damage and malign the reputation of our client in the society, general public, family, friends and political circle and to cause undue harm to his personal and professional life.
7. Our client further states that, the 1<sup>st</sup> of you made false allegations against our client and further you have spoken to media with an ulterior motive to tarnish the image, reputation and good will of our client and the 1<sup>st</sup> of you being MLA and in a responsible position ought not to have made such



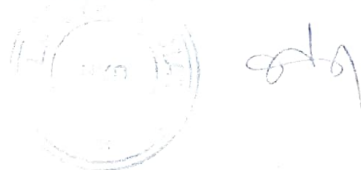
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false allegations which do not bear true and correct facts. Our client further states that the 2<sup>nd</sup> to 7<sup>th</sup> of you being in a responsible position in the society as media has telecasted and published the same in a negligent manner, without verifying the veracity of the allegations and without confirming its truth from our client and the said act of yours is illegal, unethical and highly deplorable. The 1<sup>st</sup> to 7<sup>th</sup> of you with a malafide and dubious intentions and with a criminal conspiracy to cause loss to our client and cause undue harm to him both, personally and professionally have spread these false allegations and there is no iota of truth in the said allegations. There are no bonafidies on your part in making such allegations and further telecasting and publishing them has caused loss of reputation and belittling our client before the general public and political circle, family and friends. Several people from the general public and the political circle nationwide and internationally have called our client and asked him about the said allegations and its telecasting and publishing and thereby, our client has lost his reputation, name and fame which has been painstakingly built for years together and irreparable damage has been caused to him beyond a point of repair. The allegations levelled by the 1<sup>st</sup> of you and the factum of said news item and its telecasting/publishing in the electronic and print media by the 2<sup>nd</sup> to 7<sup>th</sup> of you came to the notice and knowledge of all the general public, family, friends and political circle not only nationally but also internationally and thereby you have created a stigma on our client's reputation and caused immense damage/loss willfully, wantonly and maliciously without any bonafidies on your part. Our client further came to know that apart from speaking bad about our client in the media, the 1<sup>st</sup> of you is also damaging the reputation and spreading bad about our client in the political circle in general and general public at large by word of mouth. Your acts and deeds are aberrant and willful. The fact remains that 1<sup>st</sup> of you is the



MLA from BRS Party and the management of the 2<sup>nd</sup> to 7<sup>th</sup> of you also belong to the same political party i.e. BRS, and all of you have conspired together and hatched a plan to tarnish the image of our client and to take undue advantage politically, as he belongs to rival political party i.e. Indian National Congress and further having a grudge against our client as he belongs to the same district of Karimnagar to which the 1<sup>st</sup> of you belong. It is not out of the place to mention here that this is not the first instance or the first of its kind, but even on some previous occasions the 1<sup>st</sup> of you have leveled false allegations against our client and his family members and went to media and you are in the habit of maligning and tarnishing the image of our client with malicious and malafide intentions.

8. Our client further states that, his reputation was tarnished because of such false allegations levelled by the 1<sup>st</sup> of you which were telecasted and published by the 2<sup>nd</sup> to 7<sup>th</sup> of you and our client was put to untold mental agony by such false and defamatory statements, which you knew, are not true. Our client has suffered psychologically as well as physically due to your above illegal acts and deeds. Our client, due to his impeccable integrity has gained immense respect in the political circle, general public, family, friends and relatives. However, due to the false/defamatory/scandalous/ malicious allegations levelled by the 1<sup>st</sup> of you which were telecasted and published by the 2<sup>nd</sup> to 7<sup>th</sup> of you, our client's image has been tarnished and his reputation was defamed. The nature of the allegations are extremely offensive. The same is fatally injurious to the dignity and reputation of our client, who, by virtue of his professional profile, is a public figure. Such malevolently malicious statements/allegations have been deliberately made to tarnish his reputation. Your above said act is not based on honest belief in the guilt of our client. Further, you are aware of the good will of our client and

A handwritten signature in blue ink is written over a circular stamp. The stamp contains some illegible text and a central emblem.

knew that making allegations by the 1<sup>st</sup> of you, telecasting and publishing the same by the 2<sup>nd</sup> to 7<sup>th</sup> of you, about our client, is groundless and still with malice, the 1<sup>st</sup> of you alleged and 2<sup>nd</sup> to 7<sup>th</sup> of you have telecasted and published the same. The unwarranted allegations and its telecasting and publishing amounts to defamation and is in itself an injury to our client's reputation and therefore, our client is entitled to seek damages and you are liable to pay the same. Our client further states that the term "malice" denotes spite or hatred against an individual but it is often difficult to infer spite or hatred from the conduct of a person. It is said that the devil does not know the mind of man. Thus, in the particular instance it is not only "malice" but it is "malice animus", thereby denoting that you have actuated by an improper motive. Your act amounts to "libel" which means 'a published false statement that is damaging to a person's reputation'; 'a written defamation'. Our client cannot assess the quantum of damage that was caused to him as the damage that was caused by you is not assessable since you have gone beyond a point of repair and for the above said illegal acts and intentional deeds all of you are jointly and severally liable to be prosecuted both under civil and criminal law.

In the light of the aforementioned trajectory of facts and events, our client hereby call upon all of you jointly and severally to do the following:

- i. Compensate our client to the tune of Rs.10,00,00,000/- (Rupees Ten Crores only) towards injury/loss of reputation as a person and for causing mental agony;



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- ii. Cease and desist forthwith from issuing/giving/publishing/telecasting/re-telecasting any other scandalous/libelous/defamatory statements against our client in any manner whatsoever including but not limited to print media, electronic media and social media;
- iii. Take all necessary steps to forthwith delete/takedown/remove all the publications of vituperative/libelous statement, allegations levelled, published and telecasted against our client in various media forums such as print, electronic and social media at your own cost;
- iv. To tender unconditional apology to our client forthwith and also to publish and telecast the apology in the very same news channels along with other reputed English and Telugu Daily News Papers and Channels and consequently post YouTube videos and release the same in electronic media interviews publishing your unconditional apology to our client with the same prominence in which you had made the allegations.

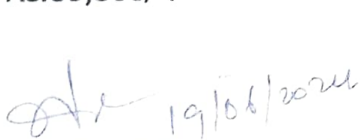
If you fail to comply with the above legitimate demand of our client within 7 days from the date of receipt of this Legal Notice, he shall be advised and constrained to approach appropriate court of law under different laws available to him which includes civil and criminal remedies for defamation and under those circumstances you shall be solely held liable and responsible for the costs and consequences arising thereof and our client shall not be held liable and responsible and our client is also entitled to claim appropriate damages in such an event and you are liable to pay the same.

However, our client do trust and believe that good sense will prevail upon you and you will try to avoid the costs, complexities and

hazards of litigation by meeting and complying with the legitimate demand of our client. If you chose to ignore this demand notice, you may do so at your own risk and peril.

Please be noted that this notice is issued without prejudice to the other rights, claims and contentions of our client in this matter. A copy of this Notice has been preserved in our office for records and future course of action.

You are also liable to pay the costs of this legal notice quantified at Rs.50,000/-.

 19/06/2024



**ETOORU POORNACHANDER RAO**

Advocate.

ENS Law Associates.