



AYATHAN ASSOCIATES

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By Email / Courier / RPAD

REPLY TO YOUR LEGAL NOTICE

Date: 30.05.2024

To,
CYRIL PRASAD PAIS & ASSOCIATES,
Advocates
#301, 2nd Floor, Ram's Infantry Manor,
No.70, Infantry Road,
Bangalore – 560 001
Email: cyril.pais@gmail.com

C.C. to:
MR.GURU RAJKUMAR,
Aged about 30 years,
S/o. Raghavendra Rajkumar,
Residing at No.248, 18th Cross,
Upper Palace Orchards,
Sadashivanagar,
Bengaluru – 560 080
Email: gurrurk@gmail.com

Sir,

Our reply to your Legal Notice dated 19.04.2024 is under instructions from our clients MS.SRIDEVI BYRAPPA, aged about 35 years, D/o. B. Byrappa, residence address No.248, 18th Cross, Upper Palace Orchards, Sadashivnagar, Bengaluru – 560 080 and presently pursuing her higher education at Harvard University, USA having residence at No.2, Soldiers Field Park, Apartment No.712, Boston, M.A.012163, USA, is as follows:

01. At the outset our client is in deep shock and agony by the behavior of your client, which has caused sever harassment and trauma to our client. Our client has informed us of all the harassment caused by your client in tandem with his family in committing grave injustice to our client. Our client is the legally wedded wife of your client and has dutifully served the best interest of your client and his family for over



9 years. Despite all the mental harassment, financial and physical abuse, atrocities met by her in her marital life, she has always endured the same to ensure the family interest is protected and safeguarded. Your client, was caught having an affair with his co-actor, Ms.Saptami Gowda and was confronted by our client during her visit in December, 2023 which was then brought to light to our client by family and friends that he was indulging in the adulterous act with his co-actor, Ms.Saptami Gowda for about a year now and he has only confirmed to his cruel intentions against our client by issuing the legal notice under reply.

02.Our client upon facing the harsh reality of your client during her visit to India in December, 2023, she was left in a state of shock, despair and distress by the actions of your client. Our client was in between securing a master's degree with the prestigious institution at Harvard University when she had to face the atrocity of knowing the adultery caused by your client and thereafter face the abusive treatment of abandonment, mental and physical harassment, financial restraint to the extent of attempting to throw our client out of her own matrimonial home, when the mistress, Ms.Saptami Gowda was provided access into the matrimonial home of our client. Our client has many instances and acts of cruelty faced by her at the hands of your client and his family, but we wish to restrict the same to provide our responses to your allegations levelled against our client in your legal notice keeping the best interest of the Parties, in mind. However, we seek to reserve our rights to make such claims and allegations against your client as and when needed at such appropriate time, place and jurisdiction. We therefore traverse the contentions of your Legal Notice as below:

03.It is true that the marriage of our client with your client was solemnized on 26.05.2019 at Palace Grounds as per the customs prevailing in Hindu Community. However, the averments that it was a



love marriage is partially true since the same also came to be arranged by the family thereafter. It was your client who had shown interest in our client and your client was in a courtship with our client for a period of about 5 years prior to marriage. The decision to marry our client was a well thought out event, where the parents and family on both sides had familiarized with each other prior to the marriage. Our client was a focused career oriented self-made woman, owing to these qualities of our client, your client who at the time of their courtship was unemployed, going through financial losses and constraints, was not stable and living without any focus on his future life. Your client had shown his desire to marry our client, as our client inspired your client to build a career for himself and bring stability in his life. Our client who had remained focused on her work was taken over by the fanciful efforts made by your clients and being naïve had fallen in love with your client's demeanor of loving our client. It was the efforts of our client as his spouse, as his friend, that your client is reaping the benefits, which is evident from your notice as well. Given the background on things leading to marriage between the Parties, it is pertinent to note that at the time of marriage your client and his family had imposed sever pressure on our client and her family to have the marriage in a certain manner at a particular location and emotionally manipulating our client into expending huge amount of money to have an extravagant and a pompous wedding which was not in any manner acceptable in the interest of our client. Our client and her family obliged to carry out all the demands of your client, only to ensure the happiness and peace of your client and his family is protected. It is true that there were over 10,000 people from your client's side who had attended the wedding which only proves the allegations of our client. It is true that there are no children from the wedlock.

04.The averments at para 3, that your client was unable to make an informed decision by understanding our client properly due to



circumstances prevailing at the time of their courtship and wedding, owing to his father's health issues, financial crisis in the family and pressure from my client's family to get married despite your client being younger by 4 years is all an afterthought after having committed an adultery with Ms.Saptami Gowda, on our client. Your client was in a committed dating relationship with our client for over 5 years before they decided to marry. Your client is presently trying to walk away from his responsibilities as a spouse by cheating and committing a fraud on our client and is without any remorse insulting the institution of marriage by making these false and frivolous allegations against our client. Your clients' assertions that our client married your client with vested intentions by taking advantage of his circumstances and that your client married our client despite many warnings from friends and family including our client's, that, our client was not the right person and that our client's intentions were known to them only puts your client and his ability to make informed decisions into question. Your client is admitting to making wrong choices in his life and this proves his immaturity and indecisiveness. For a Man who married his friend, is now in love with his co-actor, Ms.Saptami Gowda, has failed to maintain the basic dignity earned by his family to showcase decency towards his own spouse. Our client has met with a great deal of mental harassment and cruelty at the hands of your client and his family when the entire fault is glaringly pointed towards your client. Your client's poor assessment of good times is glaringly reflected in his false and fraudulent messages sent to our client until December 2023 and his behavior when our client was in India during her winter break. It was infact your client's actions which had caused a tumultuous and difficult time when he was caught cozying up in the hotel room with his co-actor, Ms.Saptami Gowda, and the said confrontations by our client had led to the so-called cruelty alleged by your client, given it's a spousal right to question the adulterous spouse. If anyone must allege any cruelty it is our client for the hardship caused on her where she faced the



inhumane treatment from your client and his family. Your allegations of mental and physical cruelty caused by our client is outrightly denied by our client and we have only provided with the required clarifications in this regard by further reserving our rights to take appropriate action against your client and Ms.Saptami Gowda.

05.The averments at para 4 are all false and baseless and your clients are put to strict proof of the same. If our client's intention were to divide the family, then our client would not have lived with your client's parents until she left for USA for further studies. As a matter of fact, if our client was so manipulative and conniving then she wouldn't have left all her jewelry worth crores of Rupees (a list of which is available with our client along with all its receipts) with your client's mother for safekeeping. Our client can prove and establish the relationship she shared with every member of your client's family and seek to use the same only when it is found appropriate. Your client in his desperate attempt to move onto the next women in his life is now making false allegations against our client in bad taste which is only defaming and shaming his own family's name and reputation.

06.The averments at para 5, that it was our client who did not want to have children since she did not want them to be raised by his parents or have the influence of his parents as they would turn out spoilt like your client and his brother is denied and it is a figment of your client's imagination to make such allegations against our client. It is a well-known fact and your client is aware of the sexual difficulty faced by your client during the initial years of their marriage. Your client in his own deepest shame and guilt is now blaming our client for all his drawbacks which is once again derogatory to the stance and standing of his family. Our client being older to your client has always sought to have children, but your client has always made his age an excuse and avoided having children as he himself had to be taken care by his mother and my client. Your client's indiscretion in trying to hide his

sexual problems by making vague reasons and excuses against of our client's inconsistency or indecisiveness only reflects poorly on your client and our client denies the said allegations. Our client has already provided all the reason to your allegations for not having physical intimacy for significantly long durations but wish to reiterate that your client's nature of causing adultery in the marriage due to his lack of accountability, nature to harassing with cruel intentions, failing to show marital commitment towards our client and philandering habit of jumping from one relationship to another without holding on the sanctity of marriage only shows that if there is anyone facing mental cruelty it is our client. Further your client's demeaning ways to slut shame a woman only shows the nature of his character and his upbringing and our client is deeply hurt to comment on the same.

07. Before traversing the averments at para 6, our clients wish to bring it on record that it was indeed the brain child of our client to set up the Dr. Rajkumar Academy and its sister concern Dr. Rajkumar's Learning App [collectively referred to as 'Institutions'], both running as a Partnership Firm. Our client was also instrumental in assisting, helping and managing the other enterprises run and operated by your client's family. Our client had married into a household of debts, instability and chaos to manage day to day functioning despite the family holding several fixed assets. Our client took on the burden to run the household even before her marriage and set-up the Institutions only to ensure there is an operational business route which can help the family sustain. It is a known fact that your client and his family at the time of marriage were running the family businesses at a loss and it is only when our client intervened both professionally and financially, where the money was brought in by our client through her own earning and her family, there was stability seen by your client who was able to find an opportunity to make an entry into the films at this age despite their family being in the



industry for decades together. Our client has always handled the programs, communications, marketing and administration of the Institutions and the Finance and Sale was always managed and handled by your client. All financial approvals and decisions were made by your client and our client was only acting on behalf of the instructions provided by your client. Your client has very cleverly quoted his unavailability at the office and made our client the front end of all transactions without any right over financial decisions. All the finances were controlled and managed by your client and his team along with their Chartered Accountant. Apart from providing for OTP's to bank transfers and enabling management of certain finances owed to close family and friends, only based on the approvals provided by your client, our client has never initiated any financial transactions on her own accord despite being a partner in the Firm. The further averments at para 6, on setting up the Academy is partially true however all allegations of incompetency, mismanagement, misappropriation and misdeeds are denied, and your client is put to strict proof of the same. Further the claims of Ms.Girija Srinivas is a judicial record and there has not been any allegations proved against our client specifically. Our client wishes to only ask your client, if there was so much of a misunderstanding with our client for over 8 years then why is it that your client remained silent until date and did not take any action against our client? Why is it that your client did not do the least of terminating the partnership of our client when she was found to have caused so much of a disruption? Why is it only when his adulterous relation with his co-actor, Ms.Saptami Gowda, was brought to light that he is making these false allegations against our client? We put it to your client that if the case of Ms.Girija Srinivas is causing disrepute to the client's family then what about the suicide of their own accountant, several affairs running in the family the latest of your client coming to the extent of our client having to respond to your legal notice.



08. The averments at para 7, that our client coerced your client to securing a loan by pledging his ancestral family property to secure a loan using the academy for her personal business aspirations outside of the academy by redirecting the funds from such loans into her personal account is denied and your client is put to strict proof of the same. It is pertinent to note here that the Firm consisted of 2 other partners and if your client is contending that he was fooled by our client then what were the other partners or even the other office bearers of the Institutions doing? What did the Firm do when Ms. Rupali Chauhan questioned all the partners of the Firm for financial mishaps leading to difficulty in operations? Why was only Ms. Rupali Chauhan's loans to the Firm closed immediately, the moment she raised concerns about the mismanagement of the Firm in the absence of our client at the Firm? Why are the loans from other creditors denied and there was a special exemption made only to clear out the loans of Ms. Rupali Chauhan despite there being financial crunch to operational costs? These basic questions cloud the minds of the ordinary to understand the sanctity of your client's allegations against our client however your client has opted to draw this into a nasty affair by making false allegations against our client which will not be quietly absolved by our client. The allegations on ascertaining the current liability by an independent auditor as of March, 2024 shows unauthorized over drawings amounting to Rs.4,04,58,227/- by our client has not been officially notified to our client. Our client, although a partner in the Firm has not been kept in the loop for such official approvals to conduct audits or even provided access to the books of accounts and statements to validate the claims of your clients. Your client must be mindful of the fact that he continued to remain in charge of the Institutions after our client left to the USA in July, 2023 for undertaking her Higher Education at Harvard University giving ample opportunity to your client to embezzle and misappropriate funds, when our client was not available in India at that time. The fact of the matter regarding our client's intention to



pursue this higher education was instigated by your client. It was your client's proposition who sought to send our client away so he could continue his adulterous affair with his co-actor, Ms.Saptami Gowda, since he had found the opportunity to debut in the film industry. Your client was completely involved in helping our client make this transition to move to USA to pursue her higher education through a student loan. Your client was enthusiastic in ensuring our client took on the opportunity so he could be left in peace to carry on his affair. Our client seeks to ask your client, if our client was so hopeless and incompetent in managing the affairs of the Firm then why is it that your client is now asking our client to stand accountable for managing the Institutions? Your client is a capable man to carry on the business as always then why is he alleging our client for abandoning the Institution. If there is anyone who is abandoned in this entire marriage it is our client. It is your client who has always disrespected our client's efforts to ensure the family stays afloat and stable, her work and dedication has been ignored by your client and his family when all she did was be a dutiful wife and dedicated all her life, time, effort, money and self into the benefit and goodwill of your client and his family. The averments of student loan are a stated fact that as her spouse it is our client's legal right to make her husband a Guarantor. It is also a known fact that the repayment of the loan amount commences only when the education is completed. Your client's lateral thinking to turn the tables on our client for his illegal actions is applaudable but will not be able to stand in the court of law.

09. Your clients insinuated threats to our client and her family reflects poorly on your client's desperation to break his marriage with our client. The contentions in para 8, on the investment in properties and lavish lifestyle of our client is laughable when the evidence can prove otherwise. We deny all the allegations and put your clients to strict proof of the same. We are confused to the nature of the legal notice



issued by your client since the subject line is for a dissolution of marriage through mutual consent, but the allegations made against our client is for misappropriation and mismanagement of funds. This shows the mentality of your client in depicting the suffering faced by our client throughout her relationship with your client. There lies no essence of basic courtesy and humanity in your client who was in the wrong to commit adultery in the marriage but is now harassing our client in the midst of her educational pursuit by making these false allegations and continuing to mentally harass our client. Our client will take a strong stand against your client if he furthers his harassment against my client especially her family members. Your client's ulterior motive in it all is targeted towards achieving a different cause and if he is under the impression that the threats to our clients family will be tolerated then our client only wishes to intimate your client that she too will take a stand as an aggrieved spouse by bringing out all the harassment, violence, cruelty, mental / physical torture, financial pressure imposed by your client and his family and all the atrocities faced by her right from her meeting your client until date.

10. The averments at para 9 and 10, only proves the mindset of your client in the marriage with our client. Our client upon marriage to your family becomes a part of your family and your petty cause of allegation only shows your accountability as her spouse. Our client made no such false representation as alleged by your client, Harvard as an institution does not yield into intake of false representation. If your client is challenging that our client has made false representation, then it is in turn questioning a great institution as Harvard and its selection committee. My client reserves her right to defend herself against allegations of misrepresentation and puts your client is put to strict proof of the same. However our client seeks to know if his adulterous relationship with Ms. Saptami Gowda while still married to our client shows any integrity held by your client or his



family in treating our client with such disrespect? And wouldn't that hurt the reputation and dignity of your client and his family? How is it that adultery is a permissible norm especially when caused on a woman is considered as a normal means of life. The action of your client is pitiable and concerning. All other allegations are denied, and your client is put to strict proof of the same.

11. Our client denies all the allegations levelled against her and further informs your client to do right by her. Our client is the lawfully wedded spouse of your client who deserves basic decency and dignity as a woman. Your client cannot walk away from insinuating our client in his falsehood only to cover his shortcomings and faults. Our client does not deserve this form of treatment from your client after all that she has done for the sake of your client and his family. Our client is now made to fend for herself in a new country so far away from her home, when your client himself had assured to take care of her while she was completing her higher education at Harvard University. Our client has met with great hardship due to the atrocity and harassment imposed by your client. Your client's conniving means to throw out his own spouse for the sake of his girlfriend / co-actor, Ms.Saptami Gowda, is demeaning to the dignity of a women and our client wishes to take appropriate action against your client and his girlfriend, in this regard. Your client's fraudulent acts of looping our client with his lies and false promises until December, 2023 portraying himself to be a loving, caring and honest spouse, but on the contrary he was committing adultery, cheat and fraud on our client along with his family, has deeply hurt and caused severe damage to the well-being of our client. Our client wishes to seek appropriate action and remedy against your client for the same.



THEREFORE we wish to only intimate your client and his family to refrain from causing anymore strain on our client and her family, failing to do so will be at their sole risk and cost. Further to abstain from making any false threats to our client and her family with an intention to cause pressure on our client, as our client will not yield into any such pressure tactics from your client.

Thank you.



Deepti Ayathan
Advocate

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ADVOCATES + CONSULTANTS