## EASHWAR PRASAD B., ADVOCATE,

#### KAR/1094/2001

To.

Date: 17/09/2025

1. BTV Kannada, Crescent Tower, #32/1-2, Crescent Road, next to Goldfinch Hotel, High Grounds, Gandhi Nagar, Bengaluru, Karnataka 560001 btvkannada2023@gmail.com

2. Varshini News, 9741939173 varshininewsmys@gmail.com

3. Suraj Rao,
Resident Grievance Officer for YouTube,
Google LLC - India Liaison Office,
Unit No. 26,
The Executive Center,
Level 8, DLF Centre,
Sansad Marg,
Connaught Place,
New Delhi – 110001
support-in@google.com

4. Meta Platforms, Inc Unit 28 and 29, The Executive Center, Level 18, DLF Cyber City, Building No.5, Tower A, Phase III, Gurgaon-122002. fbgoindia@support.facebook.com

5. Prem Prasad Shetty, S/o. Jayaram Shetty, R/at: C/o. M/s. Unnathi Career Academy, 'Ashachandra Trade Centre', III Floor, PPC 1st cross, Udupi-576101.

Sir/Madam,

Sub: Legal Demand Notice for payment of compensation for airing defamatory news and for demanding immediate stopping circulation/airing and taking down the defamatory content from online servers/archives,

#15, 4<sup>TH</sup> FLOOR, GRAND MAJESTIC MALL, GANDHINAGAR, BENGALURU-560009. #9448690314-8310039482 <u>EASHWARPRASADB@GMAIL.COM</u>



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### KAR/1094/2001

Under the instructions of my client **Mrs. Kajol Bhatia** W/o. Sunil Bhatia, High point 4, 4<sup>th</sup> Floor, No.4406-7-8, #45, Palace Road, Bengaluru-560001, I am issuing this legal demand notice to you all as under:

- 1. My client states that, she is the absolute owner in possession and enjoyment of office premises bearing No.4706, High point 4, 7th Floor, Bengaluru having been purchased by her in public auction conducted by Bharat Co-Op Bank (Mumbai) Ltd., due to defaults committed by its borrower M/s. Unnathi Career Academy represented by Prem Prasad Shetty the noticee No.5 and said borrower having challenged the actions by the bank before Consumer Fora, Debts Recovery Tribunal, High Court of Karnataka on multiple occasions and inspite of he being an advocate and presumed to be knowing the law of the land, noticee No.5 has gone to the extent of misusing the media and social media to defame my client and in this regard, it is brought to your kind information that the following news articles/ content available in the media and social media purportedly aired at the specific instructions of Mr.Prem Prasad Shetty noticee No.5.
  - a. https://varshininews.co.in/case-file-against-kajol-bhatiya/
  - b. <a href="https://x.com/varshininews/status/1967522585371132099?s=46&t=dyeea2yG4DiAgvyvmikBFQ">https://x.com/varshininews/status/1967522585371132099?s=46&t=dyeea2yG4DiAgvyvmikBFQ</a>
  - c. https://btvkannada.com/archives/20608
  - d. https://www.instagram.com/p/DOnVftwkhET/?igsh=MW4zZHpsdDRmNXp2dg==
  - e. https://youtu.be/H0CtjDzUZPg?si=p6r2zamtyaN-\_GFf
- My client states that, owing to the false and baseless news articles available in the above online platforms specifically targeting my client on behest of Mr.Prem Prasad Shetty amounts to misuse of the media and social media by noticee No.5 Mr.Prem Prasad Shetty.
- 3. My client states that, at Para No.3, page No.3 of the complaint filed by noticee No.5 before the 1<sup>st</sup> ACJM Court at Bengaluru, he has stated that, on 28/06/2023, the **accused No.1 to 4** have criminally trespassed his office premises and had seized the

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same and it is submitted that, as on 28/06/2023, my client who is arrayed as accused No.6 was not at all in picture and nowhere related to the said premises and she had inspected the said property only during October 2024 when the same was brought for sale in lawful manner and as such, when the Complainant/Prem Prasad Shetty noticee No.5 had lost his possession as on 28/06/2023 and there is specific averment that the trespass was allegedly made by the accused No.1 to 4 on 28/06/2023, the question of my client committing any offence does not arise at all and such being the case, without verification of genuineness and/or veracity of the claims made by noticee No.5 Prem Prasad Shetty, you people are guilty of airing defamatory contents to increase your TRP.

- 4. This notice is served by demanding for the immediate removal of above contents published/transmitted via your organization's media channels that constitutes defamation and false and misleading information and malicious statements, causing irreparable damage to my client's legal interests to injure my client's reputation, amounting to both civil and criminal liability.
- 5. In view of the above, my client seeks for immediate removal of the above contents from all physical and electronic platforms controlled by your organizations/ companies, including websites, social media profiles, archives etc., and noticee No.5 is called upon to stop sending the messages/links of the above contents which is causing a lot of psychological harassment to my client and her family apart from defaming my client which amounts to libel and is liable for criminal prosecution.
- 6. My client further calls upon you all to render Public apology and retraction, with equal prominence and scope as the original publication, to mitigate reputational loss/ damages caused by all of you and cease and desist from further dissemination or publication of similar or related content against my client.

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- 7. Compensation of INR 1,00,00,000/- (Rupees One Crore) to be payable by you No.1 to 5 for losses suffered due to publication of defamatory contents which have been circulated by you No.5 by misusing the media and social media aired by you No.1 to 4 to mitigate the losses and humiliation and psychological harassment and social stigma faced by my client and her family members who hail from a reputed family in the society.
- 8. Failure to comply may compel initiation of civil and criminal proceedings at your sole cost and risk, for damages, injunctions, and any further relief deemed fit by competent courts. You are cautioned that all correspondence, evidence, and this notice may be used against you in court of law.
- 9. You all are liable for payment of notice charges of Rs.10,000/- each.

Yours truly,

Eashwar Prasad B., Advocate.

Note: There is no registered address available with regard to Noticee No.2 and when contacted over phone, it has been informed that there is no office and as such, signed copy is not sent by post but sent by e-mail only.