

*Read by Counsel
on 8/10/2024*

SNEHA B. PANDEY
ADVOCATE BOMBAY HIGH COURT
B.A LLB

B/15, New Shrenik CHS., Ashok Nagar, Mulund (West), Mumbai- 400 080
Email: adv.snehapandey25@gmail.com Mobile: 998755 9892

SP/23/2024

5th October 2024

To,

1. Mr. Ashwin Mehta
~~Advocate for the Applicant~~
✓ 32, Madhuli , Dr. Annie Besant Road
Worli – Mumbai 400 018
2. Shilpa Bhate & Associates
Advocate for the Respondent No.1
217, 2nd Floor, Rex Chambers,
W.H Marg, Ballard Estate,
Mumbai 400 001
3. M/s. Jadeja & Satiya
Advocate for the Respondent No.2 & 3
1st Floor, Mistry Mansion,
107, M.G Road, Fort
Mumbai
4. Mr. Jahangir Khajotia
Advocate for the Respondent No. 5, 8.1 and 9.1
Radha Bhavan, 3rd Floor, Room No. 16,
Nagindas Master Road,
Mumbai 400 023
5. Chairman, Investor Education & Protection Fund(IEPF)
Ground Floor, Jeevan Vihar Building
3, Sansad Marg, New Delhi

Sub :AFFIDAVIT-IN-REPLY ON BEHALF OF THE RESPONDENT NO. 10
AND 11

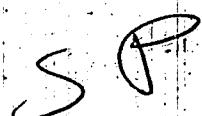
Ref : IN THE SPECIAL COURT (TRIAL OF OFFENCES RELATING TO
TRANSACTIONS IN SECURITIES) ACT, 1992
Jyoti Mehta ...THE APPLICANT

VERSUS
THE CUSTODIAN & ORS. ...THE
RESPONDENTS
MISCELLANEOUS APPLICATION NO (L) No. 10 of 2023

Sir/Madam,

I am concerned for the Respondent No. 10 and 11. Be Pleased to take on record the Affidavit-in-Reply dated 04.10.2024 on behalf of Respondent No. 10 and 11 as and by way of service upon your client through you.

Regards



Sneha Pandey

Advocate for the Respondent No. 10 and 11

Enc: Copy of Affidavit-in-Reply on behalf of Respondent No. 10 and 11

**BEFORE THE SPECIAL COURT (TRIAL OF OFFENCES
RELATING TO TRANSACTIONS IN SECURITIES) ACT,**

1992

MISCELLANEOUS APPLICATION NO. 10 OF 2023

SMT. JYOTI H. MEHTA

...APPLICANT

VERSUS

THE CUSTODIAN &
ORS.

...RESPONDENTS

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October 03, 2024

MUMBAI

FILED BY:
Advocate Sneha Pandey

BEFORE THE SPECIAL COURT (TRIAL OF OFFENCES
RELATING TO TRANSACTIONS IN SECURITIES) ACT,

1992

MISCELLANEOUS APPLICATION NO. 10 OF 2023

SMT. JYOTI H. MEHTA

...APPLICANT

VERSUS

THE CUSTODIAN &

...RESPONDENTS

ORS.

AFFIDAVIT IN REPLY ON BEHALF OF THE
RESPONDENT NO. 10 AND 11

IT IS MOST RESPECTFULLY SUBMITTED THAT;

I, Kalpana Jobalia, aged 59 years, Indian Inhabitant, the Respondent No. 11 abovenamed, and/ on behalf of my husband late Shri Jayesh Jobalia, who is Respondent No. 10 abovenamed, having address at flat no. B-801, Arihant Avenue- C, Jamnagar Road, Ghanteshvar, Rajkot, Gujarat – 36006, do hereby solemnly affirm and state as under that:

Kalpana Jobalia



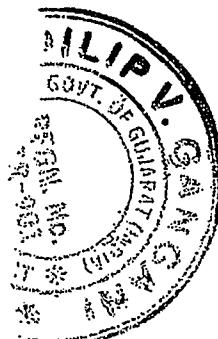
1. I am filing a common Affidavit-in-Reply on behalf of Respondent No. 10 and 11 in the present Miscellaneous Application No. 10 of 2023 ("Application"). I say and submit that the Applicant has filed the present Application with the sole objective of harassing and threatening the Respondent No. 10 and its family member ("Jobalias") by abusing the process of this Hon'ble Court, *interalia* sought unreasonable prayer to attach the shares ("subject shares"). I humbly submit that it is a matter of record that the subject shares of Hero MotoCorp Limited (the Respondent No. 2) under the Respondent's No. 11 folio bearing no. HH136969 and the Respondent's No. 10 folio bearing no. 137757, were never declared as benami or were attached by this Hon'ble Court.
2. At the outset, I have read the contents and submissions made in the Application. I deny all the allegations, claims, averments and submissions set out in the Application in toto. I further submit that the person, who was originally conversant with the facts and circumstances of such type of cases and having knowledge of the same, would be Late Mr. Harshad Mehta (deceased husband of the Applicant).

Leupoma Jobalias



interestingly, who, at that time, had not filed any affidavit or mentioned the subject shares in his original affidavit filed in MA 194 of 1993 and MA 53 of 1994, where benami shares were disclosed by him before this Hon'ble Court. Interestingly, after 30 years, the person who was working under or with late Mr. Harshad's Mehta office i.e. Mr. Ashwin Mehta (**the Advocate of the Applicant**), has tried to take undue advantage of facts and circumstances of the present case, claiming the subject shares as benami shares of Late Mr. Harshad's Mehta.

3. That the present Application was filed with ulterior motive to harass and threaten the Jobalia's family members by illegally attaching the freely available shares in the name of Jobalia's and illegally defaming the Jobalia's as benami shareholders of Late Mr. Harshad Mehta and/or the other 28 notified parties (*notified vide Gazette Notification No. 23 dated 08.06.1992*). On this ground only, the present Application is liable to be dismissed with the cost for filing frivolous Application.



Jewel Prince Jewellers



4. Before going into my preliminary submissions and parawise reply to the present Application, I would like to submit the factual background of the subject shares, as under:

Process for dematerialization of the subject shares

4.1 That in the year 2020, when the COVID-19 pandemic nationwide lockdown was going on in India, during that period the Respondent No. 10, had found the original physical share certificates of Respondent No. 2, in his and the Respondent No.11 (his wife) name (**subject shares**) at his premises. Hereto annexed and marked as "**Exhibit – A**" is a copy of the original share certificates in name of Respondent No. 10 and 11.

4.2 After discussing with his family members, Respondent No. 10 has decided to process the subject shares for dematerialization and to take the advice of Ms. Payal Magiya (sister-in-law of Respondent No.11), who is a financial advisor with knowledge of share market.

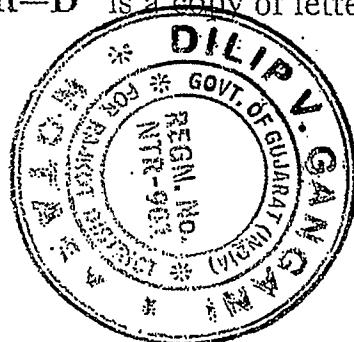
4.3 That before the Respondent No 10. could process with the subject shares for the dematerialization, he passed away due to Covid-19 on 5th May, 2021. Hereto annexed

Kalpana Javelia

and marked as "Exhibit - B" is a copy of the death certificate of Respondent No. 10.

- 4.4 That after the subsequent discussion with Ms. Payal, I decided to process the subject shares which are in my name and sent a complete set of documents and original physical subject share certificate to Ms. Payal. Ms. Payal further sent the necessary documents sent by me to Respondent No. 2 for dematerialization of the subject shares.
- 4.5 Thereafter, the Respondent No. 3, vide its letter dated June 14th, 2021 had returned all the documents, citing the reason of name discrepancy in the documents. Hereto annexed and marked as "Exhibit - C" is a copy of the Respondent's No. 3 letter dated June 14th, 2021.
- 4.6 Subsequently, I, through Ms. Payal, vide my letter dated July 19th, 2021, have again processed the dematerialization of the subject shares. Hereto annexed and marked as "Exhibit - D" is a copy of letter dated July 19th, 2021.

Karpande Jotulice



4.7 From July to October 2021, I sent reminders to the Respondent Nos. 2 and 3 to inquire about the status of the subject shares. In response to the reminders, the Respondent Nos. 2 and 3 always stated that the said documents are under verification.

Meeting with Mr. Ashwin Mehta and received threatening calls from him

4.8 During the pendency of the process of subject shares, on October 20th, 2021 around 1:30 P.M., few unknown 4 to 5 persons, representing themselves as police officers, visited my house and inquiry about the subject shares and also threatened me and my younger son by stating that "*handover the subject shares to Mr. Ashwin otherwise they will put all family members of the Respondent No. 10, behind the bars by lodging case of theft against them and etc.*"

4.9 After the said incident, from October 21st to 24th, 2021, my elder son Mr. Ishan Jobalia received three

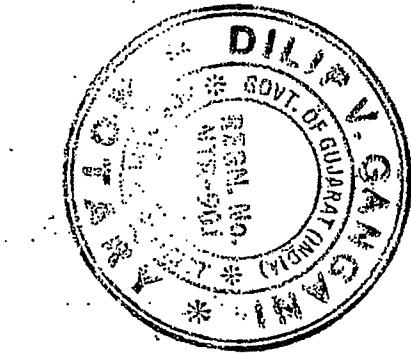
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calls from Mr. Ashwin's personal mobile number.

The first call my son received from Mr. Ashwin (mobile number +91 9819917118) on October 21st, around 11:15 to 11:30., in which Mr. Ashwin Mehta (**The Advocate of the Applicant**) said that "*the subject shares are belongs to him and threatened my son to handover the same otherwise he will again send the police to his house*". Further, during the telephonic conversations with Mr. Ashwin Mehta (**The Advocate of the Applicant**), when my son, has ask to give proof of the subject shares, then Mr. Ashwin (**The Advocate of the Applicant**) said that "*he has proof of the subject shares and he has so many orders of this Hon'ble Court, and if the Respondent No. 11 does not co-operate, then he will drag the Respondent No. 11 before the Hon'ble this Court*". The Respondent No. 11 seeks liberty to produce the English transcript of the call data records as and when directed by this Hon'ble Court.

- 4.10 During the conversation with Mr. Ashwin Mehta (**The Advocate of the Applicant**), he also

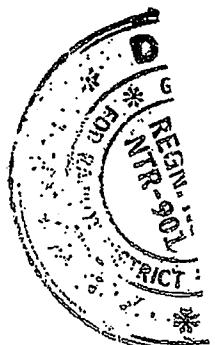
| *Karpuna Javelia*



pressurized my son, to come to his office at Mumbai, and handover all the subject shares. Further, Mr. Ashwin Mehta (**The Advocate of the Applicant**) also said that "*he will show all the proof and order of this Hon'ble Court, wherein the subject shares are in favour of Mr. Mehta*". It is pertinent to mention herein that till date, even in the present Application, the Applicant has not provided the order of this Hon'ble Court wherein the subject shares are held as benami shares or attached shares.

- 4.11 That on October 22nd, 2021, my son (Ishan) again received a whatsapp recorded message from Jatin Makani (8980211558) stating that "*I have been instructed by Mr. Ashwin bhai to provide you the documents*". The Respondent no. 11 seek liberty to produce the English transcript of the whatsapp recorded message as and when directed by this Hon'ble Court. Hereto annexed and marked as "**Exhibit – E**" is a copy of the screenshot of WhatsApp message received from Jatin Makani.

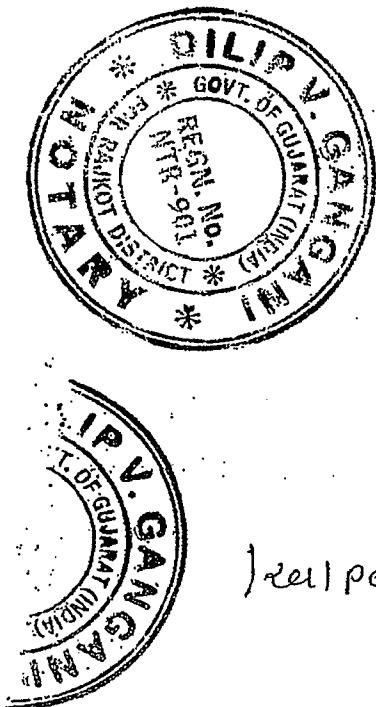
Kalpana Javelia,



4.12 I say and submit that since the apprehension made by Mr. Ashwin Mehta (**The Advocate of the Applicant**) by sending 4 to 5 unkown persons (calling themselves as a police officer) to my house and making threatening calls was so fearful and bewildering to me, to which I was compelled to approach Ms. Payal and explained the conversation happened with Mr. Ashwin Mehta (**The Advocate of the Applicant**), so Ms. Payal had decided to meet Mr. Ashwin Mehta (**The Advocate of the Applicant**) in person, to check and identity of Mr. Ashwin Mehta (**The Advocate of the Applicant**).

4.13 Somewhere in 1st or 2nd week of November 2021, I say and submit that the first meeting happened with Ms. Payal (on my behalf) and Mr. Ashwin Mehta (**The Advocate of the Applicant**). After the said meeting, Ms. Payal gave a positive impression of Mr. Ashwin Mehta (**The Advocate of the Applicant**). Further, she also advised me to "*hand over the subject shares to Mr. Ashwin after processing the dematerialization and the process of the subject*

Reponce Jocularia

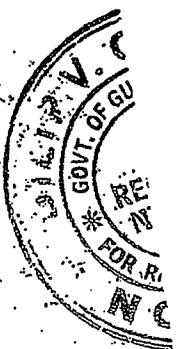


shares would be guided by Mr. Ashwin because he has given assurance that, on his advice, the subject shares would easily processed".

4.14 I say and submit that based on the advice of Ms. Payal, and having very limited knowledge of the present case, after discussing it with my elder son, I have decided to agree to process subject shares with Mr. Ashwin Mehta (**The Advocate of the Applicant**). It is pertinent to mention herein that no adverse inference should be drawn against me for giving or processing the subject shares on advice of Mr. Ashwin Mehta (**The Advocate of the Applicant**). I humbly submit that the subject shares, which were taken by Mr. Ashwin Mehta (**The Advocate of the Applicant**), are based on a false representation and threat to my life and my family.

4.15 I say and submit that to make the dematerialization of the subject shares easy with Mr. Ashwin Mehta (**The Advocate of the Applicant**), my son created WhatsApp group name "Hero Motor" on

Kalpana Patel

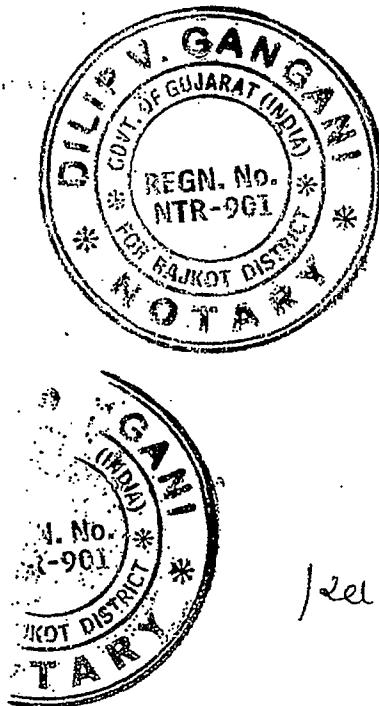


February 22, 2022, in which Ms. Payal, my sons Ishan and Tirth, Mr. Ashwin Mehta and Ajay Shah, (a person added on request from Mr. Ashwin Mehta (**The Advocate of the Applicant**)). Hereto annexed and marked as “**Exhibit – F**” is a copy of the screen shot of whatsapp group named “Hero Motor”.

4.16 I say and submit that somewhere in April- May, 2022, I have received call from Ms. Payal, and she has stated that “*Mr. Mehta has called the Respondent No. 11/ Ishan, in his office for meeting for dematerialization process of subject shares*”.

4.17 I say and submit that I had visited Mumbai along with my elder son Mr. Ishan, to meet Mr. Ashwin Mehta (**The Advocate of the Applicant**) at his office situated at Worli along with Ms. Payal. Further, during the meeting, Mr. Ashwin Mehta (**The Advocate of the Applicant**) gave assurance that he is personally looking into this assignment and he knows a few people in the Respondent No. 2,

Kelpana Golvalice

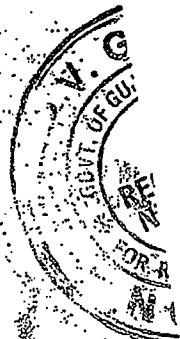


3 and 4, who, within 6 months, can get the subject shares dematerialized in my account and after that, I have to give the proceeds of subject shares to Mr. Ashwin Mehta (**The Advocate of the Applicant**) account based on Mr. Ashwin Mehta (**The Advocate of the Applicant**) advise.

4.18 I say and submit that from May 2022 to December, 2022, my elder son had visited Mr. Ashwin Mehta's (**The Advocate of the Applicant**) three times, as and when called by Mr. Ashwin Mehta (**The Advocate of the Applicant**) for process of the subject shares.

4.19 I say and submit that during that period, I also received a call from Ms. Payal, in which she advised me to start the process of shares of Jayesh Jobalia, because the processing of dematerialization of the physical shares takes time and it would be easy for Mr. Ashwin to use his recourses or connections for demat of the subject shares of Jayesh and Kalpana at the same time. Thereafter, I handed over the subject

Jayesh Jobalia



shares of Jayesh Jobalia to Ms. Payal for the process dematerialization.

4.20 That, somewhere in the month of December, 2022, I say and submit that Mr. Ashwin Mehta (**The Advocate of the Applicant**) had again called my son, Ishan for a meeting. It is pertinent to mention herein that during the said meeting at Mr. Ashwin Mehta's (**The Advocate of the Applicant**) office at Worli, he had shown the draft application of the case against Nirav i.e. Misc. Application 10 of 2023, to my son and told that "*Nirav is not agreeing on my terms to handover the proceeds of his shares to me; that is why I am filing the case against him and will take all his money with interest*". Further, Mr. Ashwin Mehta (**The Advocate of the Applicant**) also told my son to "*you should advise Nirav to handover the proceeds to me (Mr. Ashwin)*". Since my family members are not in talking terms with Mr. Nirav ("**the Respondent No. 5**") and its family members, I have recused myself from giving advice to Mr. Nirav.



Reulpunc Jobalia

4.21 Subsequently, I have received an email from the Respondent No. 3 on July 10, 2023, in which was mentioned that the legal heirs of Late Mr. Harshad Mehta (viz Jyoti Mehta "the present Applicant") has filed a case bearing Misc. Application No.10 of 2023 before the Hon'ble Special Court (Trial of Offences Relating to Transactions In Securities), claiming the aforesaid shares as Benami shares of Harshad Mehta. Hereto annexed and marked as "Exhibit – G" is a copy of email dated July 10, 2023 received from the Respondent No. 3.

4.22 Thereafter, I informed about the email dated July 10, 2023 to Ms. Payal, and Ms. Payal, after advice from Mr. Ashwin Mehta, through my email id (jobaliatirth94@gmail.com) has replied to the Respondent No. 3 that "**We have also confirmed with Mr Aswin shantilal Mehta , he is also saying that he has not filed a complaint against Mrs Kalpana jobalia & Mr Jayesh**"

Kalpana Jobelia



Jobalia, so please check once again & confirm". Hereto annexed and marked as "Exhibit – H" is a copy of an email dated July 17, 2023 received from the Respondent No. 3.

4.23 I say and submit that until March 2024, I was under the impression that the subject shares were under verification, and whenever it was credited, I had to give it to Mr. Ashwin. After that, I received the present case filed in my name and immediately, I contacted Mr. Ashwin for the same. During the WhatsApp call with Mr. Ashwin Mehta (**The Advocate of the Applicant**), he told me, "*Not to worry in the present case; nothing will happen to me; he has only filed the case against Mr. Nirav. Further, he also advises me to keep silent in this matter.*"

Having said so the factual background of the present case, I would like to make preliminary submissions to the present Application before going into the parawise reply to the Application, which are as under:

Isha Pomer Jobalia



5.1 The present Application is an abuse of the process of this Court. I say and submit that the Applicant, is very much aware and had knowledge that in September 1999, when the Income Tax Department had filed an Affidavit ("Income Tax Affidavit") in M.P. 99 of 1998 ("Exhibit D of the Additional Affidavit of the Applicant"), wherein the Income Tax Department on the basis of name, allege some shares as benami shares. Subsequent, to the said Income Tax Affidavit, the Respondent No. 2 had filed its Affidavit dated 08.12.1999 ("Exhibit -1 of the Additional Affidavit filed by Respondent No. 2") has given detailed folio wise break up of all the shares. After detailed submissions and completion all pleadings, this Hon'ble Court has passed the Order dated 08.04.2003 ("Exhibit G to the present Application"), wherein this Hon'ble Court has attached 20,270 shares of the Respondent No. 2, which were primarily on the basis of an Affidavit filed by Harshad Mehta, further the alleged benami shares, which were part of the Income Tax

Kalyana Javelia



Affidavit, there was no order for attachment in the year 2003. Interestingly, the Applicant at that time has not filed any review or appeal against the said Order for not including the alleged benami shares, which the Applicant is claiming in the present Application. But, in the year 2023, now, the Applicant is referring to the said Income Tax Affidavit, for adjudicating and attaching the said subject shares as benami shares before the same Court. It will be pertinent to note that this Hon'ble Court has already decided the said issue, so prima facie, the present Application is nothing but an abuse of the process of this Hon'ble Court and also hit by doctrine of estoppel.

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- 5.2 That the present Application is barred by law of limitation. I say and submit that even assuming without admitting that the Application is a fresh application, then also the Applicant has knowledge in the year 2003, the subject shares were not included as the benami shares by Order dated 08.04.2003 and for this reason alone, the present



Kejalpanna Jotalia

Application suffers from serious laches.

- 5.3 That the Applicant has not established its right to represent the legal interest of late Shri Harshad Mehta. The Applicant has neither produced any copy of Will or any Succession Certificate or Legal Heirship certificate to establish that the Applicant is the sole legal heir of her late husband(Harshad S. Mehta). Thus, the Applicant has no locus to represent late Shri Harshad Mehta.
- 5.4 I say and submit that it is a matter of record that the Applicant vide its Advocate's letter dated 05.05.2012 (**"Exhibit-T to the present Application"**) had sought information qua only 20,270 shares of Harshad Mehta declared as benami shares. Further, it is also a matter of record that the Applicant has never filed any appeal or review against the Order dated 08.04.2003. The aforesaid facts, seriously raise one question why, suddenly, in the year 2023, the Applicant is claiming the subject shares as benami shares by

Kalpana Jotalia



misleading this Hon'ble Court by filing various judgments and orders, which has no relevance to the present case. I further submit that by the present Application, only I came to know that the subject shares, which I have agreed to give to Mr. **Ashwin Mehta (Advocate for the Applicant)** after the process of the demat of the same, are based on false representations made by Mr. **Ashwin Mehta (Advocate for the Applicant)**.

6. I say and submit that it transpired that when the shares were claimed by the Respondent No. 5, from the **Investor Education & Protection Fund ("IEPF")** ("the **Respondent No.3**") and simultaneously when the Applicant's came to know through the communication exchange between the Respondent No. 2 with respect to IEPP transfer data, the Applicant has seen as an opportunity to make illicit gains by means threat, force and coercion. Mr. **Ashwin Mehta (Advocate for the Applicant)**. has tried to gain the confidence of the Respondent No. 5 and 11 with respect to subject shares by threatening and sending goons (calling themselves as police) at house. Further, it also

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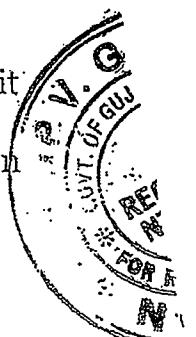


transpired that when the Respondent No. 5 has denied to the demands of **Mr. Ashwin Mehta (Advocate for the Applicant)**. The Applicant initially approached the Respondent No. 1, for illegally attaching the shares held only by the Respondent No. 5, and when the said request was rejected by the Respondent No. 1. Thereafter, the Applicant approached this Hon'ble Court by misleading the facts and case laws. Simultaneously, **Mr. Ashwin Mehta (Advocate for the Applicant)** has succeeded in his hidden motive to take the proceeds of subject shares which are in name of the Respondent No. 10 and 11. Therefore, it is humbly submitted that the Applicant has not only come clean hand before this Hon'ble Court but also failed to show its bona fide in filing of the present Application. Further, I request this Hon'ble Court to conduct an inquiry against **Mr. Ashwin Mehta (Advocate for the Applicant)**, for threatening and harassing Jobalia family.

7. Without prejudice to the aforesaid, I will now be dealing with parawise reply to the Misc. Application:

7.1. With reference to paragraph no. 1, I say and submit that the Applicant has filed the present Application

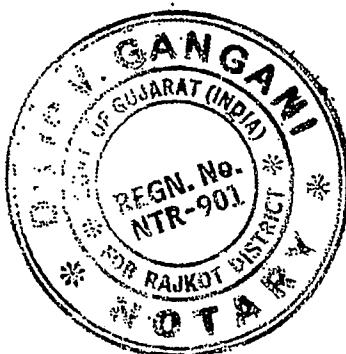
Kejipama Jobalia



by making false statements, misinterpreting and misleading facts before this Hon'ble Court. It is humbly submitted that the present Application is not filed to seek recovery of the attached assets belonging to the Applicant (**allegedly sole legal heir of Mr. Harshad Mehta**). The Applicant has filed the present Application for illegally attaching the freely available shares, without providing any conclusive proof/evidence that the subject shares are purchased by the Applicant or belongs to Mehtas. In any event, I say and submit that the present Application is not maintainable and it barred by law of limitation.

- 7.2. It is humbly submitted that the Applicant, in its entire Application, has tried to make false representation that the subject shares are attached shares or benami shares. Further, the Applicant has again and again submitted the same. But in its voluminous Application, the Applicant has miserably failed to provide any order of this Hon'ble Court, where subject shares have been

Kejriwal Javelia

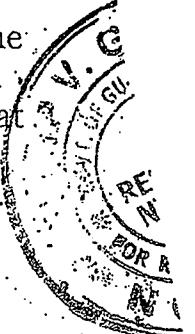


attached or called as benami shares of Mehtas.

- 7.3. With reference to paragraph no. 2, I say and submit that the said paragraph deals with the role and responsibilities of the Custodian under the TORTS Act. The contents thereof, are a matter of record and do not merit any response.

- 7.4. With reference to paragraph no. 3, I say and submit that the Income Tax Department has not filed any application/petition before this Hon'ble Court to seek subject shares as benami shares. Please see **Exhibit- C** of the present Application, even the Applicant has not attached all the Orders of the **Exhibit - C** application/petitions, which was filed by the Income Tax Department. Further, it is submitted that if the Applicant is assuming that Income Tax Department has already filed the Affidavit in M.P No. 99 of 1998 for the subject shares, then also it is submitted that the Order in the said M.P. 99 of 1998, does not include the subject shares as benami shares. Therefore, on that

Rekha Jotwaria



ground, only the present Application, should be dismissed with cost for filing the frivolous Application and misleading this Hon'ble Court.

7.5. With reference to paragraph no. 4, I say and submit, the said paragraph deals with the Respondent No. 2. Accordingly, I have nothing to offer on the same.

7.6. With reference to paragraph no. 5, the Applicant has failed to appreciate that, for adjudicating the issue of ownership of shares, the shares should be either attached or be held as benami shares by this Hon'ble Court only and in the present case, the Applicant has failed to provide any order or judgment of this Hon'ble Court, wherein the subject shares has been already been attached or called as benami shares or where the question of ownership can be raised.

7.7. With reference to paragraph no. 6, I say and submit that the Applicant is misleading and

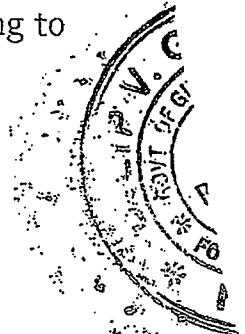
Kulpmal Jotalia



misinterpreting the Judgment of the Hon'ble Supreme Court in case of *L. S. Synthetics vs FFSL reported as (2004) 11 SCC 456*. It is humbly submitted that the Hon'ble Supreme Court has only laid down the law that the notified entities to have a locus to bring the facts of attached assets lying in the hands of third parties to this Hon'ble Court. It is pertinent to mention herein that the present subject shares are not attached assets. Accordingly, the Applicant, as per judgment in the matter of *L. S. Synthetics vs FFSL*, the Applicant has no locus before this Hon'ble Court for filing the present Application for recovering the subject shares because it is not attached shares. Therefore, it is humbly submitted to this Hon'ble Court to dismiss the present Application with cost on this ground only.

- 7.8. With reference to paragraph no. 7, I say and submit, the said paragraph deals with the Respondent No. 4. Accordingly, I have nothing to offer on the same.

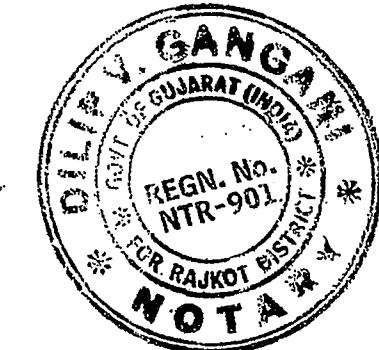
Kejpana Javalia



7.9. With reference to paragraph no. 8, I say and submit that the Applicant has made statement that "*Jobalia family headed by late Shri Dalichand Jhootalal Jobalia, Respondent No. 8 and all of whom at the relevant time has lent their names for registration of vast quantities of attached shares belonging to Mehtas in their names*". In this regard, I deny the said statement and submit that the Applicant has made false statement that all Jobalia's has given their name for the benami shares.

7.10. Without prejudice, it is humbly submitted that if the statement of the Applicant is true, then why Late Mr. Harshad Mehta, who was originally conversant with the facts and circumstances of the present case, has not filed any affidavit or mention the subject shares in his original affidavit filed in MA 194 of 1993 and MA 53 of 1994, where benami shares were disclosed by him before the Hon'ble this Court?

Julpava Jobalia,



7.11. Further, without prejudice, it is humbly submitted that if the said statement of the Applicant is true, then why till date, the Applicant has not given any proof or evidence, showing the consideration amount ought to have been paid by Mehta's for purchasing the subject shares. I say and submit that the said statement of the Applicant is an afterthought and baseless.

7.12. With reference to paragraph no. 9, I say and submit that this Court has in the M.P. 99 of 1998, already declared that the subject shares are not benami shares. Therefore, the Applicant's argument and illegal request for attaching the subject shares does not stand at all. Further, it is submitted that the Applicant at that time has not filed any review or appeal against the said Order for not including the subject shares as benami shares. But, in the year 2023, now, the Applicant is referring to the said *Income Tax Affidavit*, for adjudicating the said subject shares as benami shares before the same

Kalpana Jhalia.



Court, who has already decided the said issue, so prima facie, the present application is nothing but abuse a process of this Court, filed with ulterior motive of wreaking vengeance on Jobalia's. In the main Application filed before this Hon'ble Court, the Applicant had nowhere annexed the affidavit filed by the Income Tax Officer, the said is evident as the Applicant has relied on exhibits starting from Exhibit 'A' and ending to Exhibit 'VV'. But it is important to note that the said Income Tax Affidavit has nowhere relied by the Applicant in his original Miscellaneous Application No.10 of 2023 filed before this Hon'ble Court.

- 7.13. With reference to paragraph No. 10, I say and submit that the Applicant is not only making efforts to recover all the attached shares with accruals, which have been transferred by several companies into the IEPF account but also threatening and harassing about 1400 benami shareholders, whose shares and dividend have been referred to IEPF. It is submitted that there is no law and order

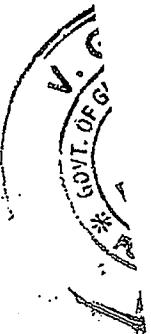


Ketulpane Jobalia

of this Hon'ble Court, where the name of benami shareholder has been disclosed, so the Applicant based on assumption, without providing any proof of purchase of the subject shares cannot claim that the subject shares are benami shares.

7.14. I say and submit that the computer program of the Applicant has manifest technical error because it is searching by the name instead of searching by the attached share number and distinctive number. I say and submit that the Applicant, using this computer program for illegal gain from 1400 benami shareholders. Because, from the aforesaid said facts, it appears that the shares, which were seized by investigation by Income Tax Department, and subsequently, attached by this Hon'ble Court through various orders. The Applicant has made a list of these shareholders and searched on IEPF data, which is available on the Company's website. And if any person by any chance, has holding in any other company, then Mr. Ashwin Mehta(Advocate for the Applicant) will

Kalpana J. Patel



approach and threaten the person to surrender these shares to Mr. Mehta like which has happened to me in the present case. In any event, I have already submitted that the computer program has technical error and **Mr. Ashwin Mehta (Advocate for the Applicant)** should include the orders of this Court and add further keywords like share number and distinctive number etc., for searching and tracing the attached shares only, because the Applicant has only right with respect to attach assets/ shares.

7.15. With reference to paragraph no. 11, I say and submit that the Applicant has knowledge and is very much aware of its right that the Applicant can recover or follow up with Respondent No.1 for the shares which are attach shares, declared by this Hon'ble Court. Even, the Applicant, had knowledge of the year 2003 (Order dated 08.04.2003), the subject shares were not attached by this Hon'ble Court. However, I failed to understand that why the Applicant, without any evidence of purchase of



I Kripalani Jotalia.

the subject shares, has proceeded now in the year 2023 for the attachment of the subject shares. I say and submit that the Applicant has no locus standi for filing the present Application. If in any event, the Applicant thinks that she has locus, then firstly the Applicant has to satisfy the Respondent No.1, on the point that the subject shares were purchased by late **Mr. Harshad Mehta (the deceased husband of the Applicant)**. On the contrary, instead of giving evidence and proof of purchase of the subject shares, the Applicant has filed a frivolous application by blaming all the Respondents for non-compliance of the orders of this Hon'ble Court.

- 7.16. With reference to paragraph no. 12, I reiterate my submissions that computer program, has a technical error and the Applicant should include the orders of this Court and add further keywords like share number and distinctive number etc., for searching and tracing the attached shares only, because the Applicant has only right with respect

Kulpani Jivalia



to attach assets/ shares. Further, its appears that the Applicant has filed the present Application based on the computer program, to which I humbly submits that this Hon'ble Court should not rely on result of computer program, which is develop by the private person for his personal gain.

7.17. With reference to paragraph no. 13, I say and submit that the Applicant had threatened the Joblia's to hand over the shares, which did not belong to the Applicant at all. There is no order, no proof and evidence given by the Applicant with respect to subject shares then, how can the Applicant illegally demand to handover the subject shares. It means, the Applicant at any time, can file any petition or application before this Hon'ble Court against 1400 benami person (as per the Applicant), and can claim anything which they have acquired during the period from the year 1992 to 2003, which is without any order of this Hon'ble Court.



Keupana Jobalia

7.18. With reference to paragraph no. 13, I say and submit that the Applicant even dissuaded the other Respondents from handing over the shares and accruals in their possession.

7.19. Further, why initially the Applicant has filed case only against Mr. Nirav Jobalia (the Respondent No. 5 herein) in the year 2023 and not with respect to all Jobalia's. The Applicant has the same modus operandi and had approached the other Jobalia's (including me), to hand over the subject shares or its proceeds to the Applicant, not to the Custodian. If the intention of the Applicant was honest and bona fide, the Applicant should have include all the other members of Jobalia's since the filing of the present Application.

7.20. Further, it has transpired that the Applicant is also accepting that, when the Applicant, did not receive the subject shares or its proceeds, the Applicant has filed the present Application. To which I say and submit that the present Application is nothing

Nirav Jobalia



but wreaking vengeance on Jobalia family.

7.21. With reference to paragraph no. 15, I say and submit that the Applicant is misleading this Hon'ble Court. The Applicant is referring the Order dated 08.04.2003 passed in MP 99 of 1998 for calling the Respondent as benami but has surprisingly forgot to mention that in the said MP 99 of 1998, the Income Tax Department has filed the affidavit for the subject shares as benami and the said Affidavit, has not been accepted by this Hon'ble Court in Order dated 08.04.2003.

7.22. With reference to paragraph no. 16, I reiterate my submissions that the Applicant has the knowledge and very much aware about her right that the Applicant can recover or follow up with Respondent No.1 for the shares which are attached shares, declared by this Hon'ble Court. Even, the Applicant, had knowledge in the year 2003 (Order dated 08.04.2003), the subject shares were not attached by this Hon'ble Court. However, I failed to

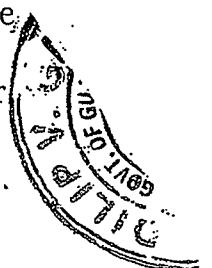
Kulpani Jobalia



understand that why the Applicant, without any evidence of the purchase of the subject shares, has proceeded now in the 2023 for the attachment of the subject shares. I say and submit that the Applicant has no locus standi for filing the present Application. If in any event, the Applicant thinks that if she has locus, then firstly she has to satisfy the Respondent No.1, on the point that the subject shares were purchased by Mr. Mehta. On the contrary, instead of giving evidence and proof of purchase of the subject shares, the Applicant has filed frivolous application by blaming all the Respondents for non-compliance of the Order of this Hon'ble Court.

- 7.23. With reference to paragraph no. 17 to 19, I say and submit that Respondent No. 10 and 11, has never been declared as a Benmai shareholder in the name of Respondent no. 2. The Applicant has no locus to question the freely available shares. The Respondent, strictly puts the burden on the Applicant to give evidence of her late husband, Mr.

Jesuprince Jobanica



Harshad S. Mehta had given purchase consideration for the subject shares. The Applicant, instead of proving ownership on the subject shares, illegally requesting the Jobalia's to prove the ownership on the shares.

7.24. With reference to paragraph no. 20, the Applicant has failed to provide any order of this Hon'ble Court or evidence or proof of purchase on the subject shares. Therefore, the Applicant, as per judgment of L. S. Synthetics vs FFSL, has no locus before this Hon'ble Court for filing the present Application for recovering the subject shares because the said shares are not attached shares. Therefore, it is humbly submitted to this Hon'ble Court to dismiss the present Application with cost on this said ground only.

7.25. With reference to paragraph no. 21 to 31, I repeat and reiterate all that is stated herein above and deny all that is contrary thereto and/or inconsistent therewith. Further, I humbly submit

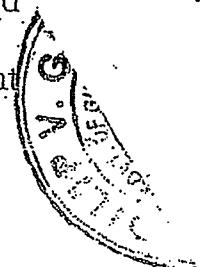
Kelpana Jobalia



that all the submission made by the applicant and judgment and order referred by the applicant is applicable to the attach assets only, not in present subject shares because this are not attached shares.

7.26. With reference to paragraph no. 32 and 33, I repeat and reiterate that the Applicant is misleading and misinterpreting the Judgment of the **Hon'ble Supreme Court in case of L. S. Synthetics vs FFSL reported as (2004) 11 SCC 456**. It is humbly submitted that the Hon'ble Supreme Court has only laid down the law that the notified entities have a locus to bring the facts of attached assets lying in the hands of third parties to this Hon'ble Court. It is pertinent to mention herein that the present subject shares are not attached assets. Accordingly, the Applicant, as per judgment of L. S. Synthetics vs FFSL, has no locus before this Hon'ble Court for filing the present Application for recovering the subject shares because it is not attached shares. Therefore, it is humbly submitted to this Hon'ble Court to dismiss the present

Keshiprakash Jovalia



Application with cost on this said ground only.

7.27. With reference to paragraph no. 34 (i) and (ii), I say and submit that the subject shares were purchased by Jobalia's and the subject shares are not attached assets of Mr. Harshad Mehta. Further, it is submitted that it is burden on the Applicant to show subject shares were purchased by her Late Husband Mr. Harshad Mehta, which in the present case, the Applicant has failed to provide the same. Further, the Applicant, instead of providing the evidence or purchase details, has shifted onus on the Respondent No. 1 and 2 to provide the inspection of the documents of share certificates and transfer form so that ownership can be ascertained. In this regard, I humbly submit that I oppose the request of inspection of the documents made by the Applicant because of two reasons, *firstly*, the subject shares were never declared as attach property of Mr. Harshad Mehta and *secondly*, it is barred by law of limitation and suffers from serious laches. The Applicant has no



| Kelpuna Jobalia.

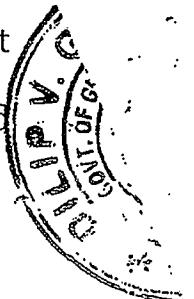
right of inspection of the documents on the basis of her merely doubt that the subject shares are benami shares.

7.28. With reference to paragraph no. 34 (ii), I say and submit that the Applicant is repeating its submissions without providing any documents or order of this Hon'ble Court, wherein the subject shares have been declared as benami shares. I say and submit that Jobalia's are not notified parties, and on the basis of name, the shares should not automatically attach.

7.29. With reference to paragraph 34(iv), I say and submit that the contents thereof are denied for want of knowledge.

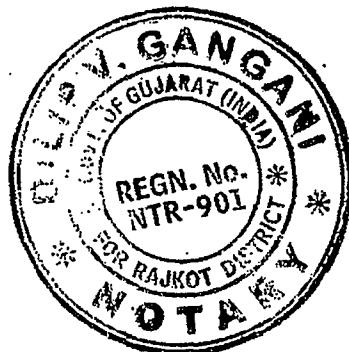
7.30. With reference to paragraph 34 (v), I say and submit that the Applicant is misinterpreting and misleading this Hon'ble Court by referring the subject shares as benami shares and applicability of the Order dated 19.10.1993 of this Hon'ble Court in MA 194 of 1993 in the present case. I say and

Leipziger Jobalia



submit that the Order is applicable on the attached shares, where attached shares have been sold to bona fide purchasers/small investors, after the notification has come into effect. In the present case, the subject shares are not attached shares, therefore, the Order 19.10.1993 of this Hon'ble Court in MA 194 of 1993 is not applicable in the present case.

7.31. With reference to paragraph no. 34 (vi), I repeat and reiterate that the person, who was originally conversant with the facts and circumstances of the present case i.e., *Late Mr. Harshad Mehta*, who at that time, has not filed any affidavit or mention about the subject shares in his original affidavit filed in MA 194 of 1993 and MA 53 of 1994, where benami shares were disclosed by him before this Hon'ble Court. But, interestingly, after 30 years, the person who was working under late Mr. Harshad's Mehta office i.e. **Mr. Ashwin Mehta (Advocate for the Applicant)**, has tried to take undue advantage of facts and circumstances of the

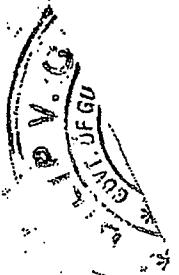


| *Leipuna Jotalia*

present case, claiming the subject shares as Harshad's Mehta shares. I say that the present Application filed with an ulterior motive to harass and threaten the Jobalia family, by illegally attaching the freely available shares and illegally defaming the Jobalia as benami shareholders of Harshad Mehta.

7.32. With reference to paragraph no. 34 (vii-viii), I repeat and reiterate my earlier submissions that the Applicant is misinterpreting and misleading this Hon'ble Court by referring to the subject shares as benami shares. I say and submit that the Applicant is repeating its submissions without providing any documents or order of this Court, wherein the subject shares have been declared as benami shares. I say and submit that Jobalia's are not notified parties, and on the basis of name, the shares can not automatically attached.

7.33. With reference to paragraph no. 34 (ix), I repeat and reiterate my submissions that the Applicant is
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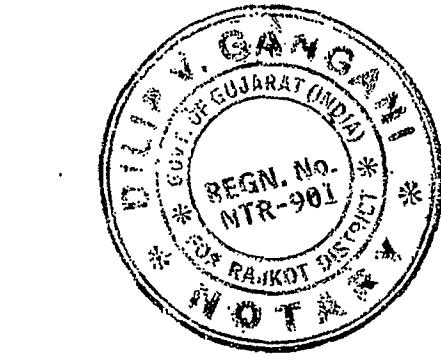
misleading this Hon'ble Court. It is submitted that Public Notice dated 26.11.1996 issued by Custodian and the Applicant's letter 30.09.2020 ("Exhibit-X of the Misc. Application") addressed to the Respondent No. 2, were never about subject shares or Jobalia's shareholding. Both the Public Notice and the Applicant's letter is recovery of attached shares only, which does not include the Jobalia's name.

7.34. With reference to paragraph no. 34 (x), I repeat and reiterate my submissions that the Applicant is misleading this Hon'ble Court. I deny the contents thereof for want of knowledge.

7.35. With reference to paragraph no. 34 (xi), I say and submit that the contents thereof are denied for want of knowledge.

7.36. With reference to paragraph no. 34 (xii), I say and submit that I deny the contents thereof for want of knowledge. But it is pertinent to mention herein

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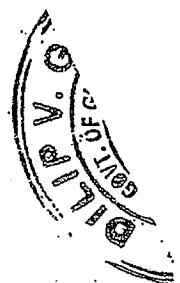


that in the Applicant letters dated 12.03.2007 and 30.09.2020, the Applicant has never mentioned the subject shares or requested the Respondent No. 2 to provide the details with respect to the subject shares. Then, why suddenly, in the year 2023, i.e. after 30 year, the Applicant is claiming the subject shares by refereeing this said letters.

7.37. With reference to paragraph no. 34 (xii), I say and submit that the contents thereof are denied for want of knowledge.

7.38. With reference to paragraph no. 34 (xii), I say and submit that I deny the contents thereof for want of knowledge. But it is pertinent to mention herein that in the letters dated 11.11.2010 and 21.12.2010, addressed by Smt. Rasila Mehta and Smt. Rina Mehta to the Respondent No. 2, has not mentioned about the subject shares or requested the Respondent to provide the details with respect to the subject shares. Then, why suddenly, in the year 2023, i.e. after 30 year, the Applicant is claiming

Ketan Patel



the subject shares in reference of the said letters, has no connection to the present Application.

7.39. With reference to paragraph no. 34 (xv), I say and submit that the contents thereof are denied for want of knowledge.

7.40. With reference to paragraph no. 34 (xvi), I say and submit that when the Applicant, has knowledge that the subject shares are benami shares of Mr. Mehta, then why she vide its Advocate's letter dated 05.05.2012 ("Exhibit-T to the present Application") has sought information qua only 20,270 shares of Harshad Mehta declared as benami shares based on the Affidavit in MA 194 of 1993 and MA 53 of 1994. Further, it is also a matter of record that the Applicant has never filed any appeal or review against the Order dated 08.04.2003. The aforesaid facts, seriously raise one question why, suddenly, in the year 2023, the Applicant is claiming the subject shares as benami shares by misleading this Hon'ble Court by filing



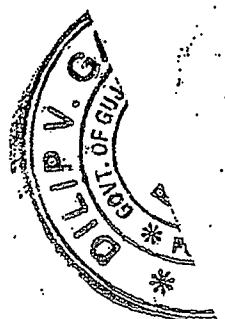
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various judgments and orders, which has no relevance to the present case.

7.41. With reference to paragraph no. 34 (xvii), I say and submit that the said paragraph deals with MA 83 of 2006 and MA 217 of 2010, which was filed before this Hon'ble Court for recovery of bonus share issued on the benami shares. But in the present case, the subject shares, were never declared by this Hon'ble Court has benami shares, therefore the Applicant claiming the subject share as benami share, is misleading and is baseless. Further, the Applicant, till date, has not given any documents/evidence, contract note, proof of purchase, and other supporting documents, which show or even indicate that the subject shares were purchased by her late husband.

7.42. With reference to paragraph no. 34 (xvii), I say and submit that the contents thereof are denied for want of knowledge.

Kalpana Javalia



7.43. With reference to paragraph no. 34 (xix), I say and submit that the order dated 18.08.2016 in MA 24 of 2016 passed in MA 244 of 2003, passed by this Hon'ble Court, is applicable on the attached property under the Torts Act. Further, vide the said order, the duty was cast on the companies to hold any attach property, should approach to the Custodian for any clarification. In this regard, it is humbly submitted that the subject shares were not attach shares, therefore requesting or holding the subject shares for transfer by the Applicant is illegal and unjustifiable.

7.44. With reference to paragraph no. 34 (xx) to (xxii), I say and submit that the contents thereof are denied for want of knowledge. But, from the submission of the Applicant that she was following up with the Respondent No. 2 regarding the shares which were already declared as "benami" shares by this Hon'ble Court and IEPF data.

7.45. With reference to paragraph no. 34 (xxiii), I say

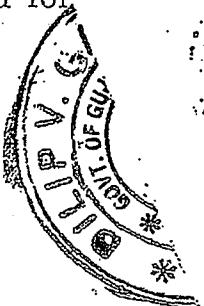
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and submit that this is the first time, when the Applicant, after lapse of more than 30 years, has claimed the subject shares as benami shares, when the Applicant stumbled upon the data sought information from the Respondent No.2 and Respondent No. 4 regarding all the shares transferred to IEPF in the year 2020 of the Respondent No.2. Subsequently it appears that, the Applicant thought this as an opportunity to grab the genuine and legitimate shares of the Joballia's including the Respondent No.10 and 11 herein and further the Applicant addressed a letter to Respondent No.2 vide letter dated 27.11.2020 (**Exhibit AA of the present Application**). Thus, vide this said letter this was an attempt to gain information regarding the shares held by the Respondent No. 10 and 11 of the Respondent No.2 company.

7.46. With reference to paragraph no. 34 (xxiv), I say and submit that the contents thereof are denied for want of knowledge.

Kalpana Joratia



7.47. With reference to paragraph no. 34 (xxv), I say and submit that the Respondent No.2 had rightfully replied and requested the Applicant to provide the order of this Hon'ble Court where the subject shares have been declared as benami. However, it is pertinent to note that the Applicant has failed to point out in the present Application regarding any order to show regarding the subject shares declared as benami.

7.48. With reference to paragraph no. 34 (xxvi), I say and submit that when the Applicant had addressed a letter vide letter dated 27.11.2020 addressed to the Respondent No.2 for recovery of shares of Jobalia's as benami shares, was not sufficient to declare as benami shares, then again the Applicant vide its letter dated 14.01.2021 has again tried to mislead the Respondent No.2 and 3 by falsely claiming and misinterpreting the orders of this Hon'ble Court.

7.49. With reference to paragraph no. 34 (xxvii), I say

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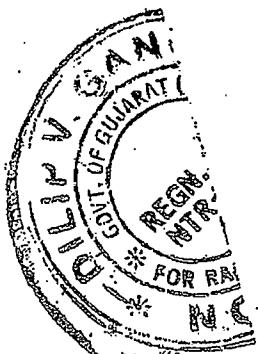


and submit that the contents thereof are denied for want of knowledge.

7.50. With reference to paragraph no. 34 (xxviii), I say and submit that the Respondent No.2 for the second time, vide its letter dated 10.02.2021, had rightfully again replied and requested the Applicant to provide the order of this Hon'ble Court where the subject shares have been declared as benami. However, it is pertinent to note that the Applicant has failed to point out regarding any order to show regarding the subject shares declared as benami.

7.51. With reference to paragraph no. 34 (xxix), I say and submit that the fact that the Respondent failed to claim the shares does not imply that the subject shares as benami shares. Furthermore, the Applicant vide its letter dated 23.03.2021 has again failed to point out any order to show regarding the subject shares declared as benami.

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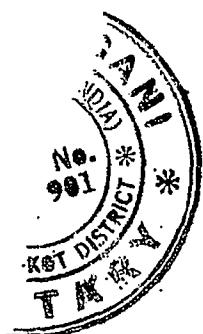


7.52. With reference to paragraph no. 34 (xxx to xxxix), I say and submit that the contents thereof are denied for want of knowledge.

7.53. With reference to paragraph no. 35 (a) to (j), I say and submit that the contents thereof are denied in toto. On the contrary I submit on the basis of the following facts that Mr. Aswhin Mehta the counsel for the Applicant has tried to take undue advantage of the present situation Mr. Ashwin Mehta is trying trying to take undue advantage of facts and circumstances of the present case, claiming the subject shares as benami shares of Late Mr. Harshad's Mehta by filing the frivolous, bogus and baseless Application before this Hon'ble Court. The sole intent of the present Application is not only to harass the family members of the Joballia's and gain unlawfully by claiming shares which legally belong to the Joballia's which can be seen from the below mentioned facts:

- a. Till date the Applicant has failed to provide

Karpurrao Jobalia



any order of this Hon'ble Court where the subject shares were declared as benami shares ;

- b. The Applicant has failed to provide any detailed reason as to why after nearly passage of 30 years, the Applicant is claiming the subject shares ;
- c. The Applicant has failed to file any review or appeal against the Order dated 08.04.2003 in MP No. 99 of 1998 passed by this Hon'ble Court, and this Hon'ble Court has already decided the said issue, so prima facie, the present Application is nothing but abuse a process of this Hon'ble Court and also hit by doctrine of estoppel.
- d. The Applicant has failed to provide any reason or justification on that since the year 2003 till 2020 why the Applicant was following with the Respondent No.2 with
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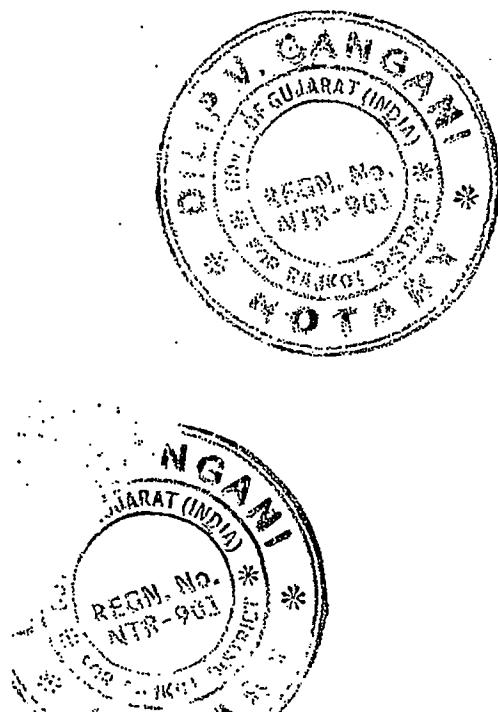


respect to only 20,170 benami shares (which does not include the subject shares which the Applicant is alleged to be claiming under the present Application).

e. If the Applicant is bonafide owner of the said shares, then why the Applicant, till date, has not given any documents/evidence, contract note, proof of purchase, and other supporting documents, which show or even indicate that the subject shares were purchased by her late husband.

f. If the present Application ought to be bonafide then why the Applicant, through her Advocate Mr. Ashwin Mehta had personally called for a meeting with the Applicant and the family members of the Jobalia's at Mumbai and during the said

Kalpana Jobalia



meeting, Mr. Ashwin Mehta had threatened and instructed the Jobalia's to get the shares dematerialized in their own name and subsequently transfer the share proceeds to the account of **Mr. Aswhin Mehta(Advocate for the Applicant)** and his acquaintance, family, friends etc.

g. If the present Application ought to be bonafide then why the Applicant, through her Advocate Mr. Ashwin Mehta has cunningly filed the Miscellaneous Application No.10 of 2023 against Mr. Nirav Jobalia only and simultaneously was monitoring dematerialization of the subject shares.

7.54. With reference to paragraph no.36 I repeat and reiterate all that is stated hereinabove and further state that I am the bonfide shareholder of the subject shares and deny all that is contrary and inconsistent herewith.

Tulpana Jobalia



7.55. With reference to paragraph no. 37 to 41 I state and submit that the said facts mentioned in the said paragraphs pertain to shares which are already attached by this Hon'ble Court and on the contrary the subject shares of the Application are not attached by any order of any court. The Applicant has in fact miserably failed to provide any documents/evidence, contract note, proof of purchase, and other supporting documents, which show or even indicate that the subject shares were purchased by her late husband. It is also key to mention that the paras 37 to 41 are not consistent with the reliefs claimed by the Applicant in the Application.

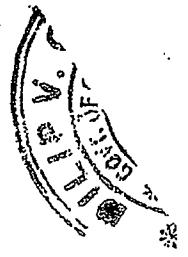
7.56. With reference to paragraph no. 42 of the Application it is nothing but abuse a process of this Hon'ble Court and the application is also hit by doctrine of estoppel. The Application is also barred by law of limitation. I repeat and reiterate my submissions and even

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assuming without admitting that the Application is a fresh application, then also the Applicant has knowledge in the year 2003, the subject shares were not included as the benami shares by Order dated 08.04.2003 and for this reason alone, the present Application suffers from serious laches.

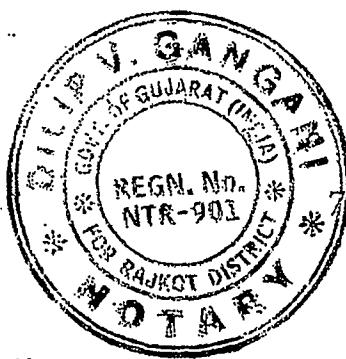
7.57. With reference to paragraph no. 43 and 44 of the Application, I repeat and reiterate that the Applicant is misleading and misinterpreting the Judgment of the Hon'ble Supreme Court in case of L. S. Synthetics vs FFSL reported as (2004) 11 SCC 456. It is humbly submitted that the Hon'ble Supreme Court has only laid down the law that the notified entities to have a locus to bring the facts of attached assets lying in the hands of third parties to this Hon'ble Court. It is pertinent to mention herein that the present subject shares are not attached assets. Accordingly, the Applicant, as per judgment of L. S. Synthetics vs FFSL, has no locus before this Hon'ble Court for filing the present Application for recovering the subject

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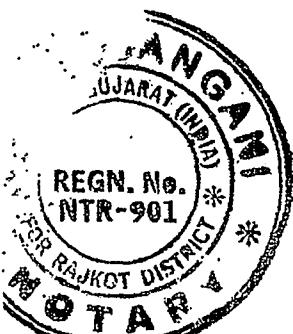
shares because it is not attached shares. Therefore, it is humbly submitted to this Hon'ble Court to dismiss the present Application with cost on this ground only.

7.58. With reference to paragraph no. 44 (a and b) of the Application, I want to clarify that I was not ready or willing to handover the proceeds of the subject shares or subject shares. It is in fact the Advocate for the Applicant **Mr. Aswhin Mehta(Advocate for the Applicant)** who by force and threat and coercion has made false apprehension of that the subject shares belong to the present Applicant. Furthermore without prejudice it is submitted that I agreed to handover the subject shares based on only false impression and threatening of **Mr. Aswhin Mehta(Advocate for the Applicant)**.



7.59. With reference to paragraph no. 44 (c to n) of the Application, I repeat and reiterate all that is stated hereinabove and deny all that is contrary thereto and/ or inconsistent thereto.

I Lajpatra Jotalia



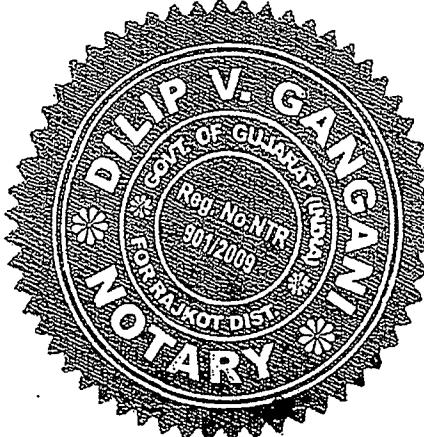
7.60. With reference to paragraph no. 45 of the Application, I repeat and reiterate all that is stated hereinabove and deny all that is contrary thereto and/ or inconsistent thereto. I further deny that the Applicant is entitled to any reliefs claimed/prayed in the present Application.

8. In the aforesaid circumstances that the Applicant is not entitled to any of the reliefs as sought in the Application. That the Application is not maintainable in the eyes of law. That the Respondent No.10 and 11 also prays that investigation should be carried in regard of the present Application with regard to the present Applicant and the Attorney, Advocate of the Applicant Mr. Ashiwn Mehta and that the present Application be rejected with cost payable to the Respondent No. 10 and 11 as:

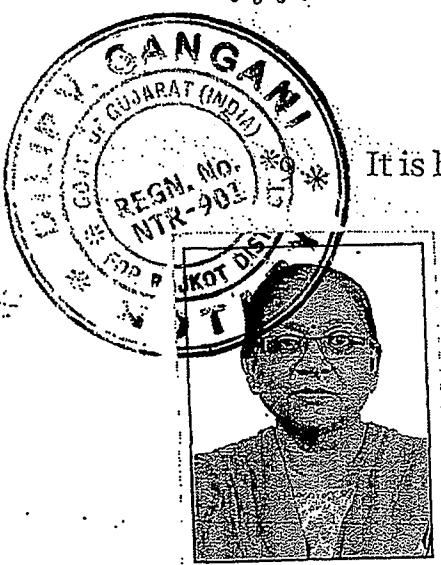
- A. This the present Application deserves to be dismissed as the Application is not maintainable and as the subject shares are not attached shares,
- B. That the Applicant has abused the process of law

[Signature]

and the Applicant has made the Respondent No.10 and 11 only to harass and the Respondent No. 10 and 11 are made an unnecessary party to the present Application.

- 
- c. That the Respondent No.10 and 11 are made to suffer at the hands of the Applicant.
 - d. That this Hon'ble Court direct the Applicant and Mr. Ashwin Mehta, to handover the subject shares to the Respondent, which was taken by them through illegal act

It is hence prayed that :

- 
- a. The present Application be dismissed with heavy costs for harassing and threatening the Respondent No. 10 and 11 and family members.
 - b. Any other reliefs as the court may deem fit.

Dated this 3rd day of October 2024

Kalpana Jobalia

Advocate for the Respondent Nos.10 and 11

Kalpana Jobalia

solemnly affirmed before me on 3rd Oct 2024

Jobalia who is

Identified by Shri H.M. Dushki

Advocate who is personally known to me on this 3rd day of Oct 2024

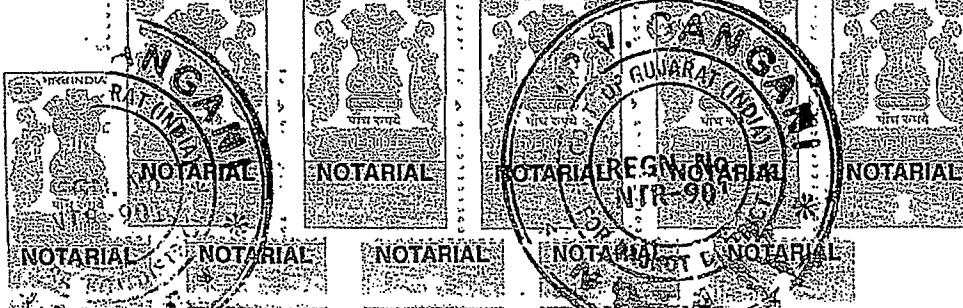
Page No. 11

Serial No. 3471

Date 3/10/24

Notary D. V. GANGANI

NOTARY RAJKOT DIST.



VERIFICATION

I, Kalpana Jobalia, aged 59 years, Indian Inhabitant, the Respondent No. 11 abovenamed, and/ on behalf of my husband late Shri Jayesh Jobalia, who is Respondent No. 10 abovenamed, having address at flat no. B-801, Arihant Avenue- C, Jamnagar Road, Ghanteshvar, Rajkot, Gujarat – 36006, do hereby solemnly affirm that whatever stated herein above in the paragraphs 1 to 9 herein are true to the best of my knowledge.

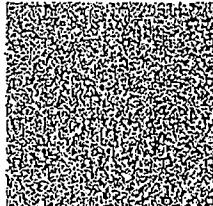
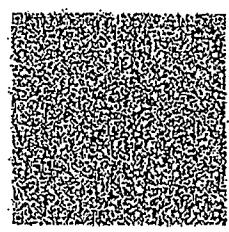
Place : *Rajkot*

Date : *2-10-24*

Kalpana Jobalia
Kalpana Jobalia

(Respondent No.11)



  <p>Enrolment No.: 0630/00/201432</p> <p>Download Date: 24/02/2024</p> <p>Issue Date: 24/02/2019</p> <p>Kalpana Jayesh Jobalia Flat No. B-801 Arihant Avenue-C Jammnagar Road Near Nageshwar Temple Ghanteshwar Rajkot Gujarat - 360006 9426828762</p> <p></p> <p>तમारो आधार नंबर / Your Aadhaar No. : 8343 8457 2289 VID : 9149 9558 2933 4681</p> <p>मारो आधार, मारी ओળख</p>	  <p>Enrolment No.: 0630/00/201432</p> <p>Download Date: 24/02/2024</p> <p>Issue Date: 24/02/2019</p> <p>Kalpana Jayesh Jobalia Flat No. B-801, Arihant Avenue-C, Near Nageshwar Temple, Jammnagar Road, Ghanteshwar, Rajkot, Gujarat - 360006</p> <p></p> <p>Address: Flat No. B-801, Arihant Avenue-C, Near Nageshwar Temple, Jammnagar Road, Ghanteshwar, Rajkot, Gujarat - 360006</p> <p>8343 8457 2289 VID : 9149 9558 2933 4681</p> <p></p>
---	--

Kalpana Jobalia,

9426828762

HERO HONDA MOTORS LIMITED**HERO HONDA**

Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057

28th September, 1995

S/N 137787 REG. NO. 32940 ERDTL 22 SET 1995 32040

JAYESH D. JOSALIA

C/O. BELL ELECTRONICS
5/5 SRASTRAM SHOPPING CENTRE
SEATTI BHARUCH

352001

Dear Sir/Madam:

Re: Bonus Issue of 19968750 Equity Shares of Rs. 10/- each.

In pursuance to the Special Resolution passed at the 15th Annual General Meeting of the Company held on 27th July, 1995, you have been allotted as per details given below, the Equity Shares of Rs. 10/- each in proportion of one new Equity Share for every one Equity Share held by you on 7th September, 1995.

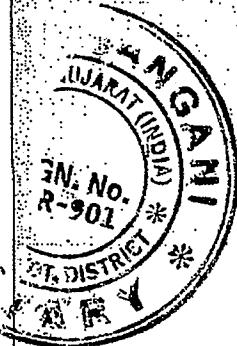
Folio No.	No. of Shares held Prior to bonus	Bonus Shares allotted
137787	3543	1840
Distinctive No(s)	Certificate No(s)	No. of Certificate(s)
352001	352001	1

The aforesaid Share Certificate(s) is/are enclosed herewith, which may kindly be acknowledged.

To: HERO HONDA MOTORS LIMITED


 U.M.C. KAMBOJ
 Company Secretary

Enclosed as above.



HERO HONDA MOTORS LIMITED

Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110057



LP - 137757 - ENCL - Q REG - 32154 107/02/95

JAYESH C. JOSALKA
 70 BELIEVEABLES
 776 SEWA BHAVI SHOPPING CENTRE
 BATNA BHARUCH

Dear Sir/Sir/Madam,

Re: Bonus Issue of 39,93,750 Equity Shares of Rs. 10/- each.

In pursuance of the Resolution passed at the 11th Annual General Meeting of the Company held on 28th September, 1994 the Board of Directors of the Company has allotted to you the Equity Shares of Rs. 10/- each, Fractional part of one Share as mentioned below, in proportion to one new Equity Share for every four Equity Shares held by you till 31st December, 1994.

Colours	Fractional Coupon No.	No. of Shares held Pro-Rata basis	Bonus Shares Allotted
137757	35692	850	212
Distinctive No/s of Share(s)	Certificate No/s	No. of Certificates/Gift券	
137743, 501, 137744, 704, 1	254387, 254388	570	

The relative Share Certificate/s/Fractional Coupon/s are enclosed herewith.

Yours faithfully,

RAMESH KAMBOJ
COMPANY SECRETARY

1 PVB CCPM
 ✓



HERO HONDA MOTORS LIMITED

Registered Office: S- Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110057

Issued of 39,93,750 Fully Paid Equity Shares of Rs. 10/- Each As Bonus Shares.

(Please read the instructions on the reverse)

This Document is valuable and negotiable.

LF - 137757 / F COUPON Z5597 REG - 32354 07/02/95

JAYESH D JOSALIA

The Fractional Coupons consolidated to make up one Equity Share must be presented to the Company not later than sixty days from the date of receipt by the member failing which the same will become invalid.

Ledger Folio No.(1)	No. of Shares held Prior to bonus(2)	Bonus Shares Allotted(3)	Fractional Part of one Share(4)
137757	850	212	0.50

This document is a Coupon representing the fractional part of a Share as mentioned in Column (4) above. The Fractional Coupons which represent/make up one Share will entitle the applicant for the allotment of one fully paid Equity Share of Rs. 10/- provided such Fractional Coupons together with duly executed and stamped Transfer Deeds are deposited with the Company vis-a-vis the instructions given overleaf.

The transfer of this Fractional Coupon will be valid only if the same along with the Transfer Deed is signed by all the member(s).

Signature(s) in the same order as per specimen recorded with the Company.

TO HERO HONDA MOTORS LIMITED

(Signature)

AUTHORISED SIGNATORY

The Board of Directors
Hero Honda Motors Limited
Community Centre
Basant Lok, Vasant Vihar
New Delhi - 110057

Dear Sirs,

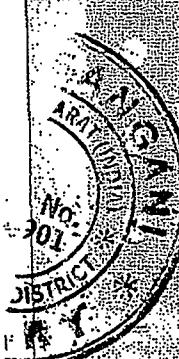
I have applied for one Equity Share enclosed herewith. Please issue the Fractional Coupons bearing the above number and enclose the relevant Transfer Deeds.

Note:

I understand that I shall be liable to pay the sum of Rs. 10/- per share and the amount of Rs. 10/- per share plus interest thereon at the rate of 12% per annum on the date of allotment of the shares.

DRAFTS TO BE ISSUED BY THE BURGERE APPLICANT(S)

NAME IN STOCKLETTER IN ENGLISH	AGE	NATIONALITY	SIGNATURE
S. D. JOSALIA			
JAYESH D JOSALIA			
JAYESH D JOSALIA			
JAYESH D JOSALIA			
Address of Sub/ 1st Applicant			



PRO HONOR MOTORSPUN

Incorporated under the Companies Act, 1956.

Registered Office : 33, Community Centre,

Basant Lok, Vasant Vihar, New Delhi - 110 057.

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s), bearing the distinctive numbers(s) herein specified in the name Company entered to the Memorandum and Articles of Association of the Company and that the amount indicated herein has been paid up on each such share.

EQUITY CAPITAL STOCK OR RIDDERS**AMOUNT AND OTHER DETAILS**BENEFICIARY'S NAME : **PRO HONOR MOTORSPUN**

Name of Holder

Signature of Holder

Date of Issue

Signature of Signatory

Chairman and Managing Director

Director

Company Secretary/Authorised Signatory

MERON HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956.)

Registered Office : 34, Community Centre,

Basant Lok, Vasant Vihar, New Delhi-110 057

THIS IS TO CERTIFY that the Person(s) named in this Certificate is/are the Registered Holders of the ~~whole~~ mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

100% **WATERPROOF** **SHIRT** **COLLECTOR**

THE PAPERS OF THE CHURCH OF JESUS CHRIST

Ford Motor Company 3H-1500 General No. 8127

Volume 10 Number 1 • April 2003 • ISSN 1062-1024 • 100

10. The following table summarizes the results of the study.

10. The following table shows the number of hours worked by each employee.

10. The following table summarizes the results of the study.

10. The following table shows the number of hours worked by 1000 employees in a company.

10. The following table shows the number of hours worked by each employee.

10. The following table shows the number of hours worked by 1000 employees.

[View all posts by admin](#) | [View all posts in category](#)

10. The following table shows the number of hours worked by 1000 employees in a company.

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[Signature]

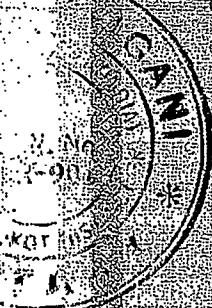
10. The following table shows the number of hours worked by each employee in a company.

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19. *Urticaria* (urticaria) - *Urticaria* (urticaria) - *Urticaria* (urticaria)

Company Secretary/Authorised Sign.

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HERO HONDA MOTORS LIMITED

Incorporated under the Companies Act, 1956
Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi-110-057

Date of Issue: 22nd July, 1992

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed herein has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
AMOUNT PAID UP PER SHARE	RUPEES TEN

Recd. Folio No: 161757 Date: 22-7-92 Certificate No: 3782

Name(s) of Holder(s)

No. of Share(s) held

Distinctive No(s)

GIVEN under the Common Seal of the Company at New Delhi this

 Chairman and Managing Director

 Director

 Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



MICO PIONEER MOTORS LIMITED

(Incorporated under the Companies Act, 1956.)

Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057.

Dividend Entitlement Period: 1st July, 1985 - 2nd September, 1985

For the Financial Year 1984-85

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
AMOUNT PAID UP PER SHARE	RUPEES TEN

Regd. No. _____ Certificate No. _____

Name(s) of Holder(s)

No. of Shares held

Distinctive No. S. No. _____

GIVEN under the Common Seal of the Company at New Delhi this

Chairman and Managing Director

Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.

HERO HONDA MOTORS LIMITED**WHERE
HONDA**

Registered Office : 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057

26th September, 1998

L/F 132561 Regd. No. 38017 Encl. 17 S.R.I. No. 38017

RECEIVED
 COMMERCIAL MAILING CENTRE S. HATI
 DELHI - 110 057
 26.9.98

Dear Sir/Madam:

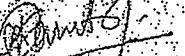
Re: Bonus Issue of 19968750 Equity Shares of Rs 10/- each.

In pursuance to the Special Resolution passed at the 15th Annual General Meeting of the Company held on 27th July, 1998, you have been allotted as per details given below, the Equity Shares of Rs 10/- each in proportion of one new Equity Share for every one Equity Share held by you on 7th September, 1998.

Folio No.	No. of Shares held Prior to bonus	Bonus Shares allotted
	123	123
Distinctive No.(s)	Certificate No.(s)	No. of Certificate(s)
	123456789 - 375324	17

The aforesaid Share Certificate(s) is/are enclosed herewith, which may kindly be acknowledged.

For HERO HONDA MOTORS LIMITED


 LAM C. KAMBOJ
 Company Secretary

Encl. as above





HONDA MOTORS LIMITED

(Incorporated under the Companies Act 1956)
Registered Office: 34, Community Centre, Basant Lok, Vasant-Vihar, New Delhi-110 057

19. The following table gives the number of hours worked by each of the 100 workers.

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10. The following table shows the number of hours worked by each employee.

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF WHICH IS RUPEES TEN

AMOUNT PAID UP PER SHARE RUPEES TEN

Pogg. Fello No. 131-12749 Certificate No. 10

Parties of Holders) - CPTA-A-159

GOALS AND STANDARDS FOR PRACTICE

ANSWER: The answer is 1000. The total number of students in the school is 1000.

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10. The following table shows the number of hours worked by each employee.

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10. The following table shows the number of hours worked by each employee in a company.

Chairman and Managing Director

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For more information about the study, please contact Dr. Michael J. Hwang at (310) 206-6500 or via email at mhwang@ucla.edu.

19. No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(Incorporated Under the Companies Act 1956)
Registered Office - 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s), bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES	TEN
AMOUNT PAID UP PER SHARE	RUPEES	TEN

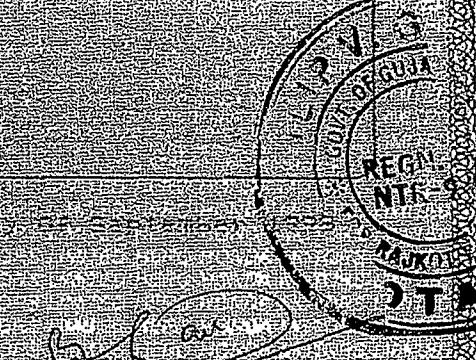
Regd. Folio No.: 142-150-2000 Certificate No.: 123456

Name(s) of Holder(s): Mr. A. K. Jha, 123, Sector 10, Chandigarh

No. of Share(s) held:

Distinctive No. (s):

GIVEN Under the Common Seal of the Company at New Delhi, This



Chairman and Managing Director

S. K. Jha
Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERC HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956.)
Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057.

THE VARIOUS ELEMENTS OF THE STATE IN THE U.S.A.

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within-mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the said Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN

Name(s) of Holder(s) _____

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Under the Common Seal of the County of New Jersey.

Chairman and Managing Director

Sold by Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

Incorporated under the Companies Act, 1956
Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi-110057

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
AMOUNT PAID UP PER SHARE	RUPEES TEN

Book Folio No. : _____ Certificate No. : _____

Name(s) of Holder(s) : _____

No. of Share(s) held : _____

DIS number(s) : _____

GIVEN under the Common Seal of the Company at New Delhi. This

Chairman and Managing Director

Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(incorporated under the Companies Act, 1956.)

Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi-110 057

U.S. GOVERNMENT PRINTING OFFICE: 1944-28-10908

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I THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within-mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

THE EQUITY SHARES EACH OF WHICH IS RUPEES TEN

AMOUNT PAID UP PER SPANISH PUPPIES TEN

Name(s) of Holder(s) : Mr. P. V. R. S. Rao

No. of Share(s) held - 1000

Distinctive No. (s)

GIVEN under the Common Seal of the Company at New Delhi: This

Chairman and Managing Director

Salyavata Director

Company Secretary/Authorised Signatory

Note : No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956)
Registered Office: 344 Community Centre, Basant Lok, Vasant-Vihar, New Delhi-110-057

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
-----------------------	------------

AMOUNT PAID UP PER SHARE	RUPEES TEN
--------------------------	------------

Regd. Folio No:	Certificate No:
-----------------	-----------------

Name(s) of Holder(s):

No. of Share(s) held:

Distinguishing(s):

Issued under the Common Seal of the Company at New Delhi This

Chairman and Managing Director

S. Jayaram
Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.

1700



YESTERDAY'S HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956.)

Registered Office : 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi-110 057

1997年1月1日开始执行。原规定与本办法不一致的，按本办法执行。

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES	TEN
AMOUNT PAID UP PER SHARE	RUPEES	TEN
Read-Hello No. 1234567890	Certificate No.	
Name(s) of Holder(s)	Mr. A. K. N. Iyer	
No. of Share(s) held	100	
Listing No. (s)	3333333333	

PRINTED UNDER THE COMMON SEAL OF THE COMPANY AT NEW DELHI THIS TWENTY-THREE DAY OF JUNE, ONE THOUSAND EIGHT HUNDRED AND ELEVEN.

Chairman and Managing Director

S. J. Jones Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956)
Registered Office: 34, Community Centre, Sector 15B, Vasant Vihar, New Delhi - 110 057

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the
registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s)
herein specified in the above Company subject to the Memorandum and Articles of Association
of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN

AMOUNT PAID UP PER SHARE RUPEES TEN

Regd. Folio No.		Certificate No.
Name(s) of Holder(s)		
No. of Share(s) held		
Distinctive No(s)		

GIVEN under the Common Seal of the Company at NEW DELHI on the 11th day of SEPTEMBER, 2001.


Chairman and Managing Director


Director


Company Secretary/Authorised Signatory

Note : No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

Incorporated under the Companies Act, 1956
Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057

（二）在本行的各項工作上，應當遵守本行的規章制度，並接受本行的監督和檢查。

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN
AMOUNT PAID UP PER SHARE RUPEES TEN

Read-False No. 73 Certificate No.

Name(s) of Holder(s) : A L B R I C H T E X T

No. of Shares(s) held

Distinguishing Notes

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Director

Company Secretary/Authorised Signatory

Note : No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HONDA HONDAMOTORS LIMITED

Incorporated under the Companies Act, 1956
Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057

This is to certify that the person(s) named in this Certificate is/are the Registered Holder(s) of the within-mentioned Share(s) bearing the distinctive number(s) herein-scribed in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed thereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN
AMOUNT PAID UP PER SHARE RUPEES TEN

Brand-Tested No. _____ Certificate No. _____

Name(s) of Holder(s) _____

No. of Share Capital

DISINTEGRATION

Given Under the Common Seal of the Company at New Delhi - This

Chairman and Managing Director

S. J. F. 1900

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HINDUSTAN MOTORS LIMITED

(Incorporated under the Companies Act 1956.)

Registered Office: 34, Community Centre, Basant Lok, Vasundhara, New Delhi - 110 057.

Registration Statement No. 122129 dated 12.9.1972.

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN

AMOUNT PAID UP PER SHARE RUPEES TEN

Regd. Folio No. _____ Certificate No. _____

Name(s) of Holder(s) _____

No. of Share(s) held _____

Distinctive No(s) _____

Issued under the Common Seal of the Company at New Delhi on the _____ day of _____ 19____.

[Signature] Chairman and Managing Director

[Signature] Director

[Signature] Company Secretary/Authorised Signatory

Note : No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956)

Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi-110057

THE UNIVERSITY OF TORONTO LIBRARY SYSTEM

THE COUNCIL OF THE SOCIETY FOR THE ADVANCEMENT OF SCIENCE

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN
AMOUNT PAID UP PER SHARE RUPEES TEN

Record Filing No. 2018-000000000 Certificate No.

Name(s) of Holder(s) John Smith

No. of Share(s) held

Disjunctive NPs

GIVEN under the Common Seal of the Company at New Delhi this

Chairman and Managing Director

S. J. Gandy
Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

Incorporated under the Companies Act 1956
Registered Office : 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057

COVENANT ENTITLED PAYMENT OF ₹ 10/- PER SHARE
FOR THE FINANCIAL YEAR 1988-89

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
AMOUNT PAID UP PER SHARE	RUPEES TEN

Holder's Name : RAMESH KUMAR GUPTA Certificate No. :

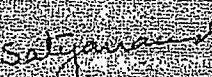
Name(s) of Holder(s) : RAMESH KUMAR GUPTA

No. of Share(s) held :

Distinctive No(s) :

GIVEN under the Common Seal of the Company at New Delhi this 1st day of January 1989.


Chairman and Managing Director


Director


Company Secretary/Authorised Signatory

Note : No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



MERCE HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956)
Registered Office: 34, Community Centre, Basant Lok, Vasant-Vihar, New Delhi-110 057

10. The following table shows the number of hours worked by each employee.

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN
AMOUNT PAID UP PER SHARE RUPEES TEN

Record Folio No. 100-100000000000000000 Certificate No.

Name(s) of Holder(s)

No. of Share(s) held

DISTINGUISHING NO. (S)

GIVEN under the Common Seal of the Company at New Delhi - This

Chairman and Managing Director

Satyanarayana
Director

Company Secretary/Authorised Signatory

Note : No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate

HONDA

HONDA

HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956.)

Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057.

Dividend entitlement Prior to w.e.f. 28.09.98

Dividend paid as on 28.09.98

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive numbers herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
-----------------------	------------

AMOUNT PAID UP PER SHARE	RUPEES TEN
--------------------------	------------

Read Folio No.: 81 Date: 28.09.98 Certificate No.:

Name(s) of Holder(s): Mr. R. K. Dutt

No. of Share(s) Held:

District/Town:

I declare that I have received my dividend in cash or by bank transfer.

Chairman and Managing Director

Director

Company Secretary/Authorised Signatory

Note: No transfer of Any of the Share(s) comprised in

be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956.)

Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057.

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s), bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company, and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
AMOUNT PAID UP PER SHARE	RUPEES TEN

Record Folio No. : 0123456789 Certificate No. : 123456789

Name(s) of Holder(s)

No. of Share(s) held

Distinctive No. of Share(s)

GIVEN under the common seal of the Company at New Delhi, this

Chapman and Managing Director

S. S. S. Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956)
Registered Office: 34, Community Centre, Basant Lok, Vasant Vihar, New Delhi - 110 057

Dividend Entitlement Period: 1st June, 1988 - 30th September, 1988

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive numbers herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN

AMOUNT PAID UP PER SHARE RUPEES TEN

Recd. Folio No. 114 Certificate No. 114

Name(s) of Holder(s) : Mr. S. K. Jaiswal

No. of Share(s) held : 1

Distinctive No./S. No. : 114

GIVEN under the Common Seal of the Company at New Delhi, the 10th day of October, 1988.

[Signature] Chairman and Managing Director

[Signature] Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HERO HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956)
Registered Office: 32, Community Centre, Bassant Lok, Vasant-Vihar, New Delhi - 110 057

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s), bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF RUPEES TEN

AMOUNT PAID UP PER SHARE RUPEES TEN

Record Folio No.: 1234567890 Certificate No.: 1234567890

Name(s) of Holder(s):

No. of Share(s) held:

Distinctive No. (S):

GIVEN under the Common Seal of the Company at New Delhi this

Chairman and Managing Director

S. Jayaraman
Director

Company Secretary/Authorised Signatory

Note: No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.



HONDA MOTORS LIMITED

(Incorporated under the Companies Act, 1956.)

Registered Office : 34, Community Centre, Basant Lok, Vasant-Vihar, New Delhi - 110 057.

Dividend Entitlement Period : 1st. 12th. 27. 32.

Dividend Received Date : 12th. 27. 32.

THIS IS TO CERTIFY that the person(s) named in this Certificate is/are the Registered Holder(s) of the within mentioned Share(s) bearing the distinctive number(s) herein specified in the above Company subject to the Memorandum and Articles of Association of the Company and that the amount endorsed hereon has been paid up on each such share.

EQUITY SHARES EACH OF	RUPEES TEN
-----------------------	------------

AMOUNT PAID UP PER SHARE	RUPEES TEN
--------------------------	------------

Regd. Folio No. 1234567890 Certificate No. 1234567890

Name(s) of Holder(s) : Mr. S. K. S. STEPHEN

No. of Share(s) held : 1

Particulars No. 1

GIVEN under the Common Seal of the Company at New Delhi This 1st Day of October 1982.

[Signature] Chairman and Managing Director

[Signature] Director

Company Secretary/Authorised Signatory

Note : No transfer of any of the Share(s) comprised in this certificate will be registered unless accompanied by this Certificate.

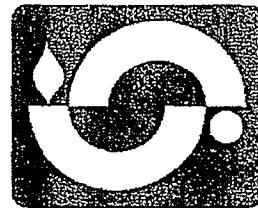


ગુજરાત સરકાર

GOVERNMENT OF GUJARAT

આરોગ્ય અને પર્વિધાર કલ્યાણ વિભાગ

DEPARTMENT OF HEALTH AND FAMILY WELFARE



મરણ પ્રમાણપત્ર

DEATH CERTIFICATE

(જન્મ અને મરણ નોંધણી અધિનિયમ, ૧૯૬૯ ની કલમ ૧૨/૧૭ અને
ગુજરાત જન્મ-મરણ નોંધણી નિયમો, ૨૦૧૮ ના નિયમ - ૮ મુજબ)
(Issued under Section 12/17 of the Registration of Birth and Death Act, 1969 and
Rule 8 of the Gujarat Registration of Birth and Deaths Rules 2018)

This is to certify that the following information has been taken from the original record of death which is in the register for
Village/City Jamnagar(C) of Taluka Jamnagar(C) of District Jamnagar of Gujarat State, India.

નામ/Name : જ્યેશ્બહાઈ / Jayeshbhai

જાતિ/Sex : પુરુષ / Male

મરણ તારીખ/ Date of Death : 05/05/2021

મરણ સ્થળ/ Place of Death :

Wednesday, May 05, 2021

military hospital

માતાપણું નામ/ Name of Mother :

પિતાજી-પતિનું નામ / Name of Father or Husband :

જયશ્રીબેન / Jayshreeben Dalichandbhai Jobalia

દલીંદખાઈ જોબાલીયા / Dalichandbhai Jobalia

મરણારના મૃત્યુ સમયનું સરનામું/ Address of deceased at the time of
Death :મરણારના કાથમી સરનામું / Permanent address of
Deceased :બી-૮૦૧ અરીહંત એવન્યુ - સી, નાગેશ્વર ટેમ્પલ પાસે, ઘટેશ્વર રોડ, રાજકોટ, ગુજરાત /B-
801.Arihant Avenue-C, Near Nageshwar Temple, Ghanteshwari Road,
Rajkot 360006, Gujaratબી-૮૦૧ અરીહંત એવન્યુ - સી, નાગેશ્વર ટેમ્પલ પાસે, ઘટેશ્વર રોડ, રાજકોટ, ગુજરાત
/B-801 Arihant Avenue-C, Near Nageshwar Temple, Ghanteshwari
Road, Rajkot 360006, Gujarat

નોંધણી ક્રમાંક/Registration No. : 6469

નોંધણીની તારીખ/ Date of Registration :21/05/2021

રીમાર્ક્સ (વિશેષ નોંધ)/Remarks (if any)

પ્રમાણપત્ર નંબર/ Certificate No : D202110328466

/0

પ્રમાણપત્ર કાઢી આપ્યાની તારીખ/ Date of issue :

પ્રમાણપત્ર આપનાર સત્તાપિકારીની સહી/Signature of issuing
authority:

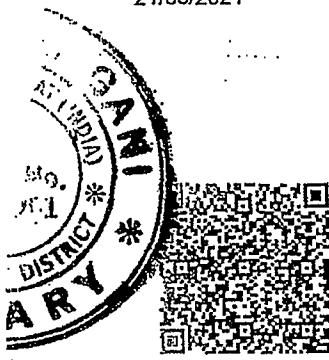
21/05/2021

1 PUNGB



Disclaimer : This is a computer generated extract of death register. In case of any objection, please contact concerned Registrar (B&D).

c5zs0jD8VMC3PDMK5lu+3Tv2aGR/t9SrJRQdrgx3bDYTEDQBezzjQCZKpG58l8GH



KFin Technologies Private Ltd.
 Selenium Tower B, Plot 31-32, Gachibowli, Financial District, Hyderabad -500032
 Phone: 040-67162222 Fax: 040-23001153 CIN: U74140TG2003PTC041636
 e-mail: einward.ris@kfintech.com Toll Free No: 1800-3454-001

COURIER

SAV/KFPL/HML/DIV/OBJ/83804

Date: 14.06.2021

To
 Mrs Kalpana Jobalia,
 Flat No - B - 801, Arijant Avenue -C,
 Near Nageshwar Temple,
 Jamnagar Road, Ghanteshwar,
 Rajkot, Gujarat - 360006.
 Contact : 9408262162; 8899430314

Dear Sir/Madam,

Unit : Hero Moto Corp Ltd.
 Folio : HML0136959
 Subject : Enquiry for unclaimed dividend and equity shares

This is with reference to your letter received by us on 08/06/2021 along with the relevant documents regards to the captioned subject.

1. Duly signed request letter
2. Self-attested PAN card photocopy of the shareholder
3. Self-attested Address proof of the shareholder
4. Application for change of address
5. Self-attested Address proof of the shareholder
6. Self-attested photocopy of bonus shares allotment letter
7. Self-attested photocopies of share certificates
8. Self-attested Aadhar card copy of shareholder
9. Self-attested bank passbook copy

On verification of the documents, we found the following discrepancies/the documents were not in order:

1. The signature is not tallying with our records; kindly provide us the Banker attestation as per the proforma.
2. The Name registered in our records as KALPANA N JOBALIA differs with the name in PAN and Aadhar as KALPANA JAYESH JOBALIA. Kindly execute an Affidavit for Name change on Rs.100/- non judicial stamp paper mentioning names therein and confirm said names pertaining to one and the same person.
3. Notarized marriage certificate/Gazette notification as a proof of name change.
4. Birth certificate/school leaving certificate/Ration card which shows the name of KALPANA N JOBALIA

Hence, we are returning all the documents submitted by you and request you to resubmit the same with above mentioned documents as per requirement for our verification.

While furnishing the requisite documents, please mention your telephone or mobile number/email ID so as to enable us to contact you for any further requirement.

In case of any clarification, write us an email to einward.ris@kfintech.com.

Thanking you and assuring the best of our services.

Yours faithfully,
 for KFIN TECHNOLOGIES PRIVATE LTD.

Savitri Mandapati
 Corporate Registry
 Encl: As above

18/6/2021
 Savitri Mandapati

1715

Registered Post

Courier

Phone:040-67162222 Fax:040-23001155
e-mail: einward.ris@kfintech.com Tol.

COURIER

SAV/KEE/HML/DIV/OBJ/83804

To:
Mrs Kalpana Jobalia
Flat No. B-801, Arihant Avenue-C,
Near Nageshwar Temple,
Jamnagar Road, Ghanteshwar,
Rajkot, Gujarat - 360006.

40342416590
BLUE DART





Tirth Jobalia <jobaliatirth94@gmail.com>

RE: DOCUMENTS FOR FURTHER PROCESSING

1 message

einward.ris@kfintech.com <einward.ris@kfintech.com>
To: jobaliatirth94@gmail.com

Mon, Jul 19, 2021 at 2:28 PM

Ref: sav/STAT/HHL/85770/12354516 Dt.: 19/07/2021

Dear Sir/Madam,

Unit : Hero Moto Corp Ltd.
Folio : HML0136969
Subject : Enquiry for unclaimed dividend and equity shares

Greetings for the day.

This is with reference to your mail regards to the captioned subject.

We regret to inform you that, we have not received physical documents.

Please share the courier consignment details to check further at our end.

Thanking you and assuring the best of our service.

Feedback

How likely is it that you would rate our services.
1-10 : 10 being the highest and 1 to lowest.

☆ ☆ ☆ ☆ ☆ ☆ ☆ ☆ ☆
1 2 3 4 5 6 7 8 9 10

We welcome the feedback to serve you better.

Best Regards,
KFin Technologies Pvt Ltd

SAVITRI MANDAPATI
Corporate Registry
Investor Service Toll Free No. : 1-800-3094-001

Visit
<https://karisma.kfintech.com>

e-Mail
einward.ris@kfintech.com

Toll-Free
1-800-309-4001



From : Tirth Jobalia (jobaliatirth94@gmail.com)
To : Einward.ris@kfintech.com secretarialho@heromotocorp.com cfo@heromotocorp.com
Neerja.sharma@heromotocorp.com
Subject : DOCUMENTS FOR FURTHER PROCESSING
Date : 15/07/2021 11:07

1 RVS 10/07
JN

Dear Sir/Ma'am,

This is with reference to your letter received as regards the difference in my name as per your Company Records.

Kindly find attached herewith the Complete set of documents, physical copies of which have been dispatched to the registered office of KFIN Technologies Private Limited.

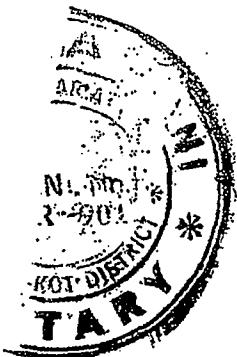
Please take the above on record and submit the necessary details with respect to the number of shares and amount of dividend standing to my credit till date.

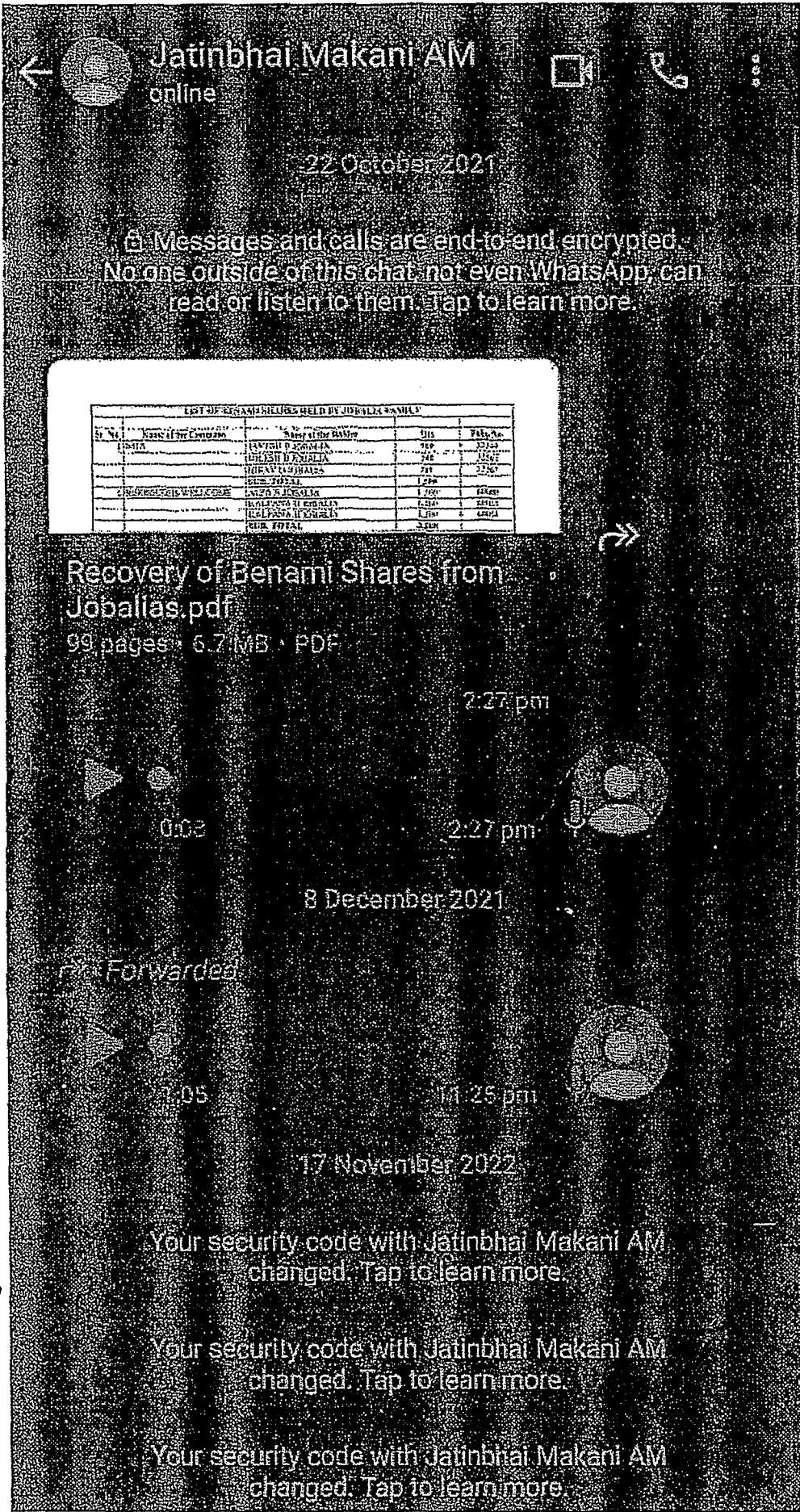
Awaiting an early response from your end as the details have been pending for a long time.

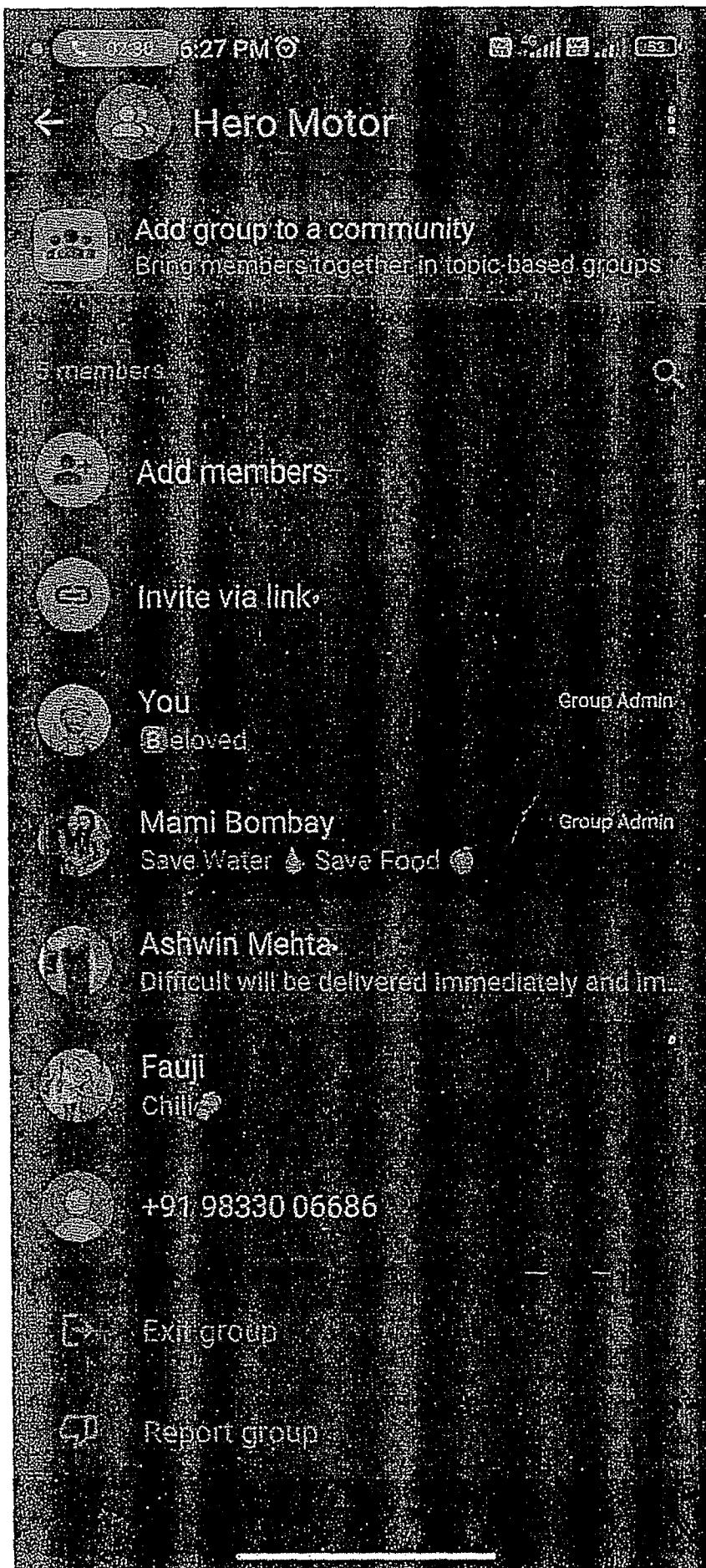
Request you to process the same as soon as possible.

Regards,

Kiran Jobalia.







RAJKOT
V





Tirth Jobalia <jobaliatirth94@gmail.com>

Claim for shares

einward.ris@k fintech.com <einward.ris@k fintech.com>
 Reply-To: einward.ris@k fintech.com
 To: jobaliatirth94@gmail.com
 Cc: savitri.mandapati@k fintech.com

Mon

Ref:HHL/107795/SAVITRIH

DL:10/07/2023

Dear Sir/Madam

Unit : HERO MOTOCORP LTD.

Sub : Request for duplicate share certificate and name change

Folio or DP ID/Client ID : HML0136969

Greetings from KFIN Technologies!!

This is with reference to your request with regards to captioned subject.

In this regard, we wish to inform you that the Petition is bulky and cannot be sent by email. However, for your reference, please find below the list of shares which are being claimed as Benami Shares. The list specifically mentions the names of Kalpana Jobalia and Jayesh D Jobalia.

In view of above, we shall act in accordance with the order of the Special Court.

This is for your information.

Feedback

How likely is it that you would rate our services.
 1-10 : 10 being the highest and 1 to lowest.

☆	☆	☆	☆	☆	☆	☆	☆	☆	☆
1	2	3	4	5	6	7	8	9	10

We welcome the feedback to serve you better.

Best Regards,
 KFin Technologies Limited

SAVITRI MANDAPATI

Corporate Registry
 Investor Support Centre : <https://is.k fintech.com/clientservices/fsc>
 RIS Website : <https://is.k fintech.com>
 Open Demat a/c : <https://ipo.k fintech.com/signIn>
 Toll Free : 1800-309-4001

Visit <https://karisma.k fintech.com> e-Mail einward.ris@k fintech.com Toll-Free 1800-309-4001

From : Tirth Jobalia (jobaliatirth94@gmail.com)
 To : savitri.mandapati@k fintech.com secretarialho@heromotocorp.com Einward.ris@k fintech.com
 Subject : Re: Claim for shares - HML0136969
 Date : 07-07-2023 08:20

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mam

Please send the copy of the petition filed in court

Rgds
 Tirth

On Thu, Jul 6, 2023 at 10:58??AM Tirth Jobalia <jobaliatirth94@gmail.com> wrote:
 | Mam



Tirth Jobalia <jobalijatirth94@gmail.com>

Re: Claim for shares

Tirth Jobalia <jobalijatirth94@gmail.com>
 To: einward.ris@kfintech.com
 Cc: savitri.mandapati@kfintech.com

Dear Sir/Mam

We have also confirmed with Mr Aswin Shantilal Mehta (the petitioner), he is also saying that he has not filed complaint against Mrs Kalpana Jobalia & Mr Jayesh Jobalia so please check once again & confirm

Rgds
 Tirth

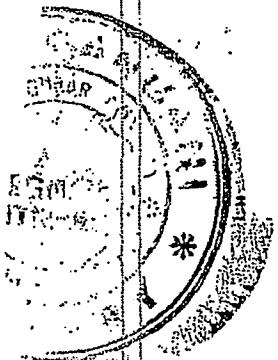
On Thu, Jul 13, 2023 at 5:10PM Tirth Jobalia <jobalijatirth94@gmail.com> wrote:
 Dear Sir/mam

I have again checked the case details on court site, there is no name mentioned of Kalpana Jobalia & Jayesh Jobalia, please provide proof that both names are mentioned in the petition
 last hearing details is attached which only says respondent from 4 to 9 (and 4 to 9 respondent name not mentioned of Mrs K jobalia & Jayesh Jobalia)

Request you to please send petition copy

Rgds
 Tirth

On Mon, Jul 10, 2023 at 2:44 PM <einward.ris@kfintech.com> wrote:


 Ref:HHL/107796/SAVITRI1

DL:10/07/2023

Dear Sir/Madam

Unit : HERO MOTOCORP LTD.

Sub : Request for duplicate share certificate and name change

Folio or DP ID/Client ID : HML0136969

Greetings from KFIN Technologies!!

This is with reference to your request with regards to captioned subject.

In this regard, we wish to inform you that the Petition is bulky and cannot be sent by email. However, for your reference, please find below the list of shares which are being claimed as Benami Shares. The list specifically mentions the names of Kalpana Jobalia and Jayesh D Jobalia.

image.png

In view of above, we shall act in accordance with the order of the Special Court.

This is for your information.

Feedback

How likely is it that you would rate our services.

1-10 : 10 being the highest and 1 to lowest.

☆	☆	☆	☆	☆	☆	☆	☆	☆	☆
1	2	3	4	5	6	7	8	9	10

We welcome the feedback to serve you better.

Best Regards,
 KFin Technologies Limited

SAVITRI MANDAPATI

Corporate Registry
 Investor Support Centre : <https://ris.kfintech.com/clientservices/isc>
 RIS Website : <https://ris.kfintech.com>
 Open Demat a/c : <https://ipo.kfintech.com/signin>
 Toll Free . : 1800-309-4001

IN THE SPECIAL COURT (TRIAL
OF OFFENCES RELATING TO
TRANSACTIONS IN SECURITIES)

ACT, 1992

Misc. Application No. 10 of 2023

Jyoti H. Mehta ...Applicant
Versus
The Custodian &Ors ...Respondents

Kelkar & Joshi
Affidavit in Reply on behalf of
Respondent No.10 and 11

4th day of October 2024



Adv. Sneha Pandey

Advocate for Respondent No.10 & 11
B-15 New Shrenik Chs, Ashok Nagar,
Mulund West, Mumbai 400 080
Mob: 9987559892

Email:snehapandey273@gmail.com