



By Email

08.10.2024

To,
Bharat Nagpal,
Founder,
iGyaan Network
C-164, First Floor, Defence Colony,
New Delhi-110024
Email: bn@igyaan.in

Subject: Immediate Withdrawal and Takedown of Defamatory Video titled
"The Biggest Scam On YouTube #TechScam2024" uploaded on
YouTube by iGyaan on 05.10.2024.

Dear Mr. Nagpal,

We are writing for and on behalf of and under the instructions of our Clients, namely **Momentum Communications (India) Pvt. Ltd.** & its director **Mr. Naimur Rahman Siddiqui** (Hereinafter referred to collectively as 'Our Clients') and do hereby serve you with the present Notice, the details of which are as under:

1. On 05.10.2024, you, the Noticee, uploaded a video on YouTube on your channel, i.e., iGyaan, with the URL <https://www.youtube.com/watch?v=90VKU4upuHA> titled 'The Biggest Scam On YouTube #TechScam2024' (Hereinafter referred to as the "Defamatory Video") wherein you made false, baseless, unsubstantiated and defamatory allegations against Our Clients.
2. In the said Defamatory Video, you, the Noticee, have made multiple false allegations against Our Clients with an intent to malign their image, reputation, and standing in the industry which has been built over a decade with sheer dedication and hard work.
3. In the said Defamatory Video, you, the Noticee, have intentionally levelled false allegations and put forward a fictitious narrative of Our Clients ability to control creators and brands, including their respective brand managers. The said allegations are not only false, frivolous, unsubstantiated and without any basis, but are also malicious and defamatory, having been made with the intention of maligning the reputation of Our Clients and creating doubts in the

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minds of the customer base of Our Clients as well as falsely accusing Our Clients of unfair trade practices.

4. In the defamatory video, you claim that your allegations are based on '*insider reports*' and a '*whistleblower email*'. However, throughout the video, there is no mention of any specific facts or findings to support these claims. Neither the existence of the alleged insider reports nor the authenticity of the '*whistleblower email*' is substantiated. You fail to present any concrete evidence, leaving the viewer with unverified claims rather than fact-based information. This proves the lack of credibility of your accusations and misleads the audience without any factual basis. In fact, the tenor of the Defamatory Video is not in the nature of reporting on the allegations in the alleged "*insider reports*" or the alleged '*whistleblower email*' but it is as if you are personally levelling allegations against Our Clients, in the manner it was made available to you.
5. The fact that you, the Noticee, are not reporting on the allegations in the alleged "*insider reports*" or the alleged '*whistleblower email*' as claimed by you in the Defamatory Video, but are personally levelling the allegations in an affirmative manner which is evident from the fact that you claim that you will approach the 'Competition Commission of India' on the basis of the allegations made by you, the Noticee, in the Defamatory Video.
6. You, the Noticee, have admittedly made the entire video only on the basis of assumptions and conjectures therefore clearly establishing that neither are you an expert on the subject matter nor have you taken any advice from any technical/educational expert before releasing such a distorted and defamatory content.
7. By way of the Defamatory Video, you, the Noticee, have not only distorted the image of Our Clients but have intentionally and maliciously portrayed Our Clients in such a twisted manner, so as to ascribe and insinuate wrongdoing on the part of Our Clients, where there is none.
8. It is absurd to allege that Our Clients would indulge and participate in such activities as alleged in the aforesaid Defamatory video and harm their own market value and stature, considering the fact that Our Clients have been running an established brand name since several years which is deemed at par with excellence, and the same is evident from the feedback and testimonials Our Clients have received and garnered from their customer base which has



been built over the years. Therefore, it is evident that you, the Noticee, have dragged Our Clients' name in your video with a view to sensationalize the reporting and to gain cheap publicity by smearing Our Clients' reputation.

9. It appears that you are in clear collusion and conspiracy with the competitor(s) of Our Clients and the Defamatory Video has been posted under such collusion and conspiracy not only to harm the name, reputation, and business of Our Clients but also to further your personal financial gains as opposed to your claims of being an honest reviewer. It is pertinent to note that you have worked on videos and product reviews for personal and financial gains through the collaboration between you and Our Clients in the past.
10. Since the aforesaid Video is false, baseless, unsubstantiated, and defamatory, it has lowered the reputation of Our Clients amongst their customers which has caused them grave prejudice and loss of business. We therefore call upon you to forthwith take down the aforesaid Defamatory Video (URL: <https://www.youtube.com/watch?v=9OVKU4upuHA>), (URL: <https://www.instagram.com/p/DAu-gZnSthl/>) and further refrain from creating, posting, sharing any further videos defaming Our Clients or for making any attempts to further defame or malign the reputation of Our Clients in any manner whatsoever. We further call upon you to issue an unconditional apology to Our Clients and post it on your YouTube Channel, i.e., iGyaan failing which Our Clients would be constrained to take appropriate legal action - both civil and criminal, which shall entirely be at your own risk, consequences, and costs.
11. A copy of the present legal notice is being retained by us for our records.

Regards,

For and On Behalf of Neo Juris


(JAYA GOYAL)
PARTNER

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