Rucha Sanjay Pawar (Advocate)

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**NOTICE REPLY**

( BY REGISTERED A.D./ SPPED POST)

Date: 10.12.2024

To,

Mrs. Archana Suresh Ghayal

Through her Advocate, Mr. Umesh V. Jadhav

D-43-253, Aamantran Co-Operative Housing Society,

Sector-2, Charkop, Kandivali (West), Mumbai-400067.

**Subject: Response to Legal Notice Dated 27th November 2024**

Respected Madam,

Under the instructions of my client, Mr. Suresh Dadarao Ghayal , this is to respond to your legal notice dated 27th November 2024.

1.My client categorically denies and does not admit to the allegations mentioned in your notice. These claims are baseless, misconstrued, and intended to tarnish his reputation.

The following are the para-wise replies :

1. The contents of para 1 are accepted to the extent that the marriage between my client, **Mr. Suresh Dadarao Ghayal**, and **Mrs. Archana Suresh Ghayal**, was solemnized on **30th April 2008** in accordance with Hindu Vedic rites. It is also acknowledged that the said marriage has not been registered.
2. The contents of para 2 are accepted to the extent that the marriage has –

resulted in two children: **Chetan**, aged 15 years, and **Om**, aged 11 years. It is also accepted that the younger son, Om, is currently under the care of your client, while Chetan is under the care of my client. However, the claim that my client has failed in his parental responsibilities is **denied**. My client has always been committed to the welfare of both children, ensuring their well-being and development.

1. The contents of para 3 are **partially accepted**. While it is true that my client and your client cohabited for a period of 10–11 years after their marriage, the allegations of mental and physical torture are strongly denied. On the contrary, my client has been a dedicated husband, always striving to maintain a harmonious relationship despite the challenges. He has continuously provided support and care, seeking to resolve any misunderstandings amicably and to maintain a peaceful household.
2. The contents of paras 4 to 11 are **denied in their entirety**. My client strongly denies the accusations of neglect towards you and the children. On the contrary, he has always been a caring husband and father, ensuring the well-being of the family to the best of his ability. Any claims to the contrary are fabricated and unsupported by facts. The allegations of neglect, irresponsibility, foul language, and failure to meet financial or emotional responsibilities are baseless, false, and concocted with malicious intent. My client has always endeavored to provide emotional and financial support, even under challenging circumstances.

**2.The following facts are presented on behalf of my client:**

1. My client has been a responsible husband and father. Despite facing difficulties due to an **unfortunate accident**, which temporarily affected his earning capacity, my client made every effort to provide for his family. It is your client who failed to support him during this difficult time and instead resorted to unwarranted disputes and harassment. Despite this, my client remained patient and continued his efforts to restore harmony in the family. He has always been committed to ensuring the welfare of both children and maintaining the family unit.
2. My client sincerely wishes to restore the marriage and is ready to welcome you back to the matrimonial home. He is committed to resolving misunderstandings amicably and creating a happy environment for you and the children.
3. If you are still unwilling to reconcile and resume cohabitation, my client is open to proceeding with a mutual consent divorce under Section 13B of the Hindu Marriage Act, 1955. My client is committed to ensuring the welfare of the children. He is ready to discuss a fair arrangement regarding custody that prioritizes the children’s best interests. My client is willing to engage in constructive dialogue to arrive at a mutually acceptable solution that serves the best interests .
4. You may respond within 15 days of receiving this reply. Failure to respond within the stipulated time will compel my client to take appropriate legal steps to safeguard his rights.

Thus, my client reiterates his desire to reconcile and rebuild the marital relationship for the sake of the family. However, if reconciliation is not possible, he is willing to proceed with a mutual consent divorce. He remains hopeful that this matter can be resolved peacefully and respectfully , prioritizing the welfare and best interests of the children.

Sincerely,

[Mr. Suresh Dadarao Ghayal] [Rucha S. Pawar]

Advocate