

PODIPARA & ASSOCIATES

E-Mail ID. Podipara Associates @ gmail.com

Advocates,
Collectorate P.O.,
K.K. Road, Kottayam-686 002.

George Emmanuel Podipara
Mob- 9745507440 (Res: 2570365)

V.J. Thomas
Mob- 9447258412

V.R. Raveendran
Mob-9447661102 (Res: 2353923)

Ref. No. 04/08/GN/VRR.

Registered with A/D

NOTICE

Complainant

Dr. Beena Gopinath,
Chellam, Burma Road,
Kumarapuram,
Thiruvananthapuram.

Accused

Anoop R. Madhavan,
2810 Oldlehighway Ste305,
Fairtan, Virginia 22031,
United States of America.

Issued by V.R. Raveendran, Advocate, Podipara & Associates, Collectorate P.O., Kottayam-2, for and on behalf and under instructions from the above named Complainant.

WHEREAS the complainant and the accused are the legal heirs and successors of the ancient Alummoottil Tharavad. The accused is the son of complainant's mother's brother Radhakrishnan who had two children. One is the accused Anoop, who is in U.S.A. and the other is his sister Malini, AND

WHEREAS the complainant recently received so many enquiries and letters about an article happened to seen in website published by the accused in the name of Alummoottil Family's official website copy right © 2002 Alummoottil family which is addressed to Kerala Kaumudi News Paper Editors as follows:-

"Even though this opinionated article or the matter contained within deserves no glorification through a response, I believe it is my duty as a member of this family to set some factual basis for this wrong public impression. The editors of Kaumudi fail to note that the current legal struggle is a fateful outcome of the greed of a particular person who is a member of our family only by virtue of marriage. He is Mr. N. Gopinathan, a retired District Judge who had married Saradamani, the only daughter of A.P. Chellamma.

Since that wedding, Gopinathan has done nothing but try to destroy the family unity and coax Chellamma and her husband (late T.K. Madhavan) to transfer custody of all the family wealth to the name of their only daughter Saradamani and her children. The greed of Gopinathan was in no way lessened by the countless properties that were transferred to Saradamani's name, not to forget the priceless artifacts and jewels that existed in the Meda and the Naalukettu that was wisked away by him".

WHEREAS the said allegations published in the Website by the accused against the complainant's father amounts to defamation which is published



intentionally by the accused to impute the deceased Sri. N. Gopinathan and harm the reputation of him. It is intended to hurt the feelings of my client her family members and other near relatives. The above said publication by the accused in the website directly and indirectly, in the estimation of others, lowered the moral and intellectual character of my client's father and lowered the character of him and generally considered as disgraceful. The above said publication and expression by the accused in the website was made malafide and was not made in good faith and there is no truth in it. The alleged Partition suit was originally filed by Sri. Radhakrishnan father of the accused along with his brothers Sivadas, Udayabhanu, Ramesh Chandran and Raveendran as plaintiffs in O.S.No.197/1983 on the file of the Subordinate Judge's Court, Mavelikara against my client and her sister and brother as the legal heirs of Smt. Saradamani. The accused is permanently residing at Virginia in U.S.A. and without knowing the real facts of the case and the family the above statement had given published AND

WHEREAS the said Gopinathan, his wife Saradamani and children including the complainant were residing at Ernakulam till 1979 and now they are residing at Thiruvananthapuram. During their stay at Thiruvananthapuram the mother of the complainant Smt. Saradamani died during the year 1985 and her husband Gopinathan died on 16-03-2007. There is no occasion to the complainant or her parents to live at Muttam where the Alummoottil Tharavadu is situated AND

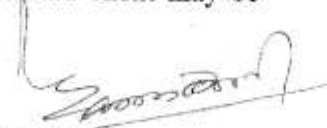
WHEREAS the baseless statement appeared in the website seen by the general public as well as by my client and after getting a number of telephone calls and letters from our well wishers, friends and relatives, directly lowered the moral and intellectual character of my clients father, AND

WHEREAS these remarks about my client's father suffered a setback in their reputation and has lowered in the estimation of their friends and the general public. The above said statements intentionally published in the website were intended to harm or having reason to believe that such imputation will harm the reputation of my client's father and to defame him and his family. The said statement published in the website with an ulterior motive lowers the moral or intellectual character, and lowered the credit of Sri. Gopinathan in the estimation of others.

I have been instructed by the complainant who is none other than the daughter of Sri. N. Gopinathan to demand of you, I hereby do within 30 days from the receipt of this notice a sum of Rs.10,00,000/- as damages and unqualified apology duly and prominently published in the website.

Please take notice that in default of your compliance with the above demand, legal action will be taken to in prosecute you for defamation in a criminal Court and/or to sue you for damages as my afore said client may be advised.

Dated this the 24th day of March, 2008.


V.R. Raveendran, B., Com., LL.B.,
Advocate, Kottayam-2.