

MR SARFRAZ NAWAZ

House No. 612, Street No. 69

Sector I-8/3

ISLAMABAD

M. 0300 557 2159

Through courier

Without Prejudice

LEGAL NOTICE UNDER THE DEFAMATION ORDINANCE, 2002

Under instructions from Mr. Najam Aziz Sethi, ex Chairman, PCB, and current Member Board of Governors, Pakistan Cricket Board (PCB), Gaddafi Stadium, Lahore ("Our Client") we hereby issue this legal notice under the Defamation Ordinance, 2002 for and on behalf of Our Client, in response to your false, disparaging, ill founded, baseless, malicious and frivolous statements and insinuations made against him:

1. Our Client is one of the most reputed independent and acclaimed journalists in Pakistan acknowledged worldwide and is the only recipient of three top international awards for journalistic courage and professionalism in a decade in South Asia. Our Client is among the first journalists in Pakistan who has been awarded '*Hilal-e-Pakistan*' by the Government of Pakistan in the year 2011. He is an ex-federal Minister and national consensus ex-Chief Minister Punjab. During his one year term as Chairman PCB he served with transparency and administrative efficiency and improved PCB profits by over Rs. 50 crores and reduced expenditures by over Rs. 05 crores.
2. That of late you have been leading a campaign of vilification and slander of Our Client in particular and the Pakistan Cricket Board in general. Earlier, when you were given a PCB contract worth Rs. 32 lacs, you were praising Our Client on TV but now when the contract is not being extended because of your failure to deliver results you have started to abuse and blackmail Our Client and the Board.
3. That since last few weeks you are continuously and repeatedly alleging false, fabricated and disparaging statements against Our Client insinuating that he is involved in gambling and till the time he is in PCB, there would be betting in cricket and that he purchased a flat in London etc. from the proceeds of gambling. You are so arrogantly and haughtily making malicious and fabricated accusations without any proof or supporting material just to gain cheap publicity and to coerce PCB to give you some employment or consulting work. No law abiding or reasonable person would dare to falsely accuse any other person in this manner the way it is being done by you. Such

disparaging misstatements are being made by you publically to damage the credibility and esteem of Our Client and to lower his reputation in the eyes of public at-large; the same are being published in newspapers and also being televised. Some of the misstatements are ATTACHED.

For leveling such bald, groundless, false and unfounded allegations and making disparaging statements against Our Client, you are directed to immediately undertake the following steps:

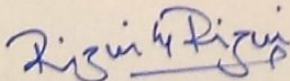
1. Retract your defamatory statement against Our Client in the same mode and manner in which it was communicated to the public at large;
2. Tender an unconditional apology;
3. Refrain from uttering such defamatory, slanderous and disparaging statements and leveling false allegations against Our Client in future.

TAKE NOTE that in case of your failure to do the needful within 14 days of receipt of this notice, Our Client reserves his right to avail all and any legal remedies available to him under the CIVIL and CRIMINAL laws of Pakistan, including but not limited to filing a suit for recovery of damages in the amount of Rupees One Hundred (Rs.100) Million for defaming him in his personal and official capacity(ies) and loss of reputation, under the laws of Pakistan. Further, Our Client also reserves the right to initiate similar proceedings against the publishers, printers, program producers and television channels who have acted in concert with you.

Any damages so recovered will be donated for the betterment of Blind and Physically Handicapped cricket.

All proceedings shall be initiated at your cost and expense. Copy kept for record.

Yours Etc.



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March 3, 2015

Encl: News items and transcripts

CC. Mr. Najam Aziz Sethi, PCB