FOUNDER MR JUSTICE (R) JAMIL HUSSAIN RIZVI 1904-1981

ESTABLISHED: 1965 RIZVI and RIZVI ADVOCATES, SOLICITORS & CORPORATE CONSULTANTS

TALIB H RIZVI

TAFFAZUL H RIZVI

ADVOCATE SUPREME COURT LLM (CORNELL) SCCS (CORNELL-SORBONNE)

MR IJAZ BUTT 32, B-2 Gulberg III LAHORE M. 03008441200

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 we would like to remind you that during the time Our Client was the Chairman PCB Pakistan played Test, ODI and T20 cricket series against Sri Lanka, Afghanistan, South Africa, Zimbabwe and West Indies and the winning ratio of Pakistan team is unprecedented. Under the stewardship of Our Client Pakistan cricket have come close to regaining its past glory, but regrettably you are harping a string of unsubstantiated and bogus allegations against Our Client in a mala fide and malicious manner.
- 3. That recently you have started a campaign of vilification and slander of Our Client. On 04 March you appeared on TV channel Din News in program "Power Lunch" and alleged false, fabricated and disparaging statements against Our Client that "

 should take some action against them". Further, on the statement made by the anchor that "

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Involvement of the second of the Minister with the statement you never denied. No law abiding reasonable person particularly who had been associated with cricket since long including holding post of chairman PCB, would falsely accuse any other person in this manner the way it is being done by you. Such disparaging statements 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 atlarge; the same are being published in newspapers and also being televised. The program can be watched at http://www.zemtv.com/2015/03/04/power-lunch-cricket-scandal-afridi-offer-15-crore-to-imran-khan-4th-march-2015/

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 <u>CIVIL</u> and <u>CRIMINAL</u> 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.

March 9, 2015

www.rizviandrizvi.com

CC. Mr. Najam Aziz Sethi, PCB