

ABHISHEK BHARDWAJ
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DELHI HIGH COURT
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BY POST/ EMAIL/ COURIER

DATED: 20.04.2020

TO,

1. **NETFLIX ENTERTAINMENT SERVICES INDIA LLP,**
MAKER MAXITY, LEVEL 7, 4TH NORTH AVENUE,
BANDRA KURLA COMPLEX, BANDRA EAST MUMBAI
MUMBAI CITY-400051
EMAIL ID: netflixindia@netflix.com
privacy@netflix.com
2. **EMMAY ENTERTAINMENT & MOTION PICTURES LLP**
302, TERMINAL-9, COMMERCIAL PREMISES, CHS,
NEHRU ROAD, NEAR POLICE STATION, VILE PARLE
EAST MUMBAI BANDRA SUBURBAN,
MUMBAI- 400057.
EMAIL ID: anaghaambekar@emmay.com
3. **VIR SARAN DAS,**
Director of Weirdass Comedy Pvt. Ltd.,
B/7,3rd FLOOR, PREM SAGAR BUILDING,
KHAR LINKING ROAD,KHAR-WEST MUMBAI,
Mumbai-400052.
EMAIL ID: accounts@weirdasscomedy.com

**SUBJECT: LEGAL NOTICE FOR DEFAMATION IN RESPECT OF THE TV
SERIES NAMED "HASMUKH" AIRING ON NETFLIX INDIA ON ONLINE
PLATFORM/ APP IN INDIA.**

SIR/ MADAM,

Address: Q18 B, Ground Floor, Jangpura Extension, New Delhi-110014

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We, the undersigned are advocates enrolled with Bar Council of Rajasthan and Delhi respectively and practicing the profession of law and appearing before various Courts and fora pan India serve upon you this notice mentioned hereinunder:

1. Law has been closely associated with the growth of mankind and civilization as a whole. Law stitches the very fabric of a society. Thereby, law as a profession is considered a noble one. The nobility of law profession comes to light via lawyers who are constantly upholding the code of law and ideas on which a society exists. Lawyers aim/ undertake to selflessly serve people from all walks of life with utmost diligence and care while displaying his/ her mettle.
2. That law profession has been often marred with disrepute and frowned upon owing to ill-fated attempts by various media houses/ television shows/ movies/ web series who try to portray the said profession and legal system as a whole in a bad light in a bid to pass the disparaging comments as comedy.
3. That you, Noticee no.1, are a streaming service which act as a platform for viewing, inter-alia, various television shows and web series on subscription basis and enjoy a wide audience from all corners of world.
4. That you, Noticee No.2, are a production company which is one of the creators of the show titled "Hasmukh" which released on 17.04.2020 and is presently airing on online platform/ App "Netflix india (www.netflix.com)". Said show is available for viewing to all the subscribers which are, even by a conservative estimate, not less than 150 million.
5. That vide episode no.4 of Season 1 "Bambai Main Bambu" of said show, the protagonist (Noticee No. 3) and writer has alleged lawyers to be thieves,

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scoundrels, goons and have had the indecency to address lawyers as "rapists".

Said statements are reduced herein for ready reference:

"...arey kya gareeb ki tokri sy tum loan mang rahe ho? Bacchey ki chaddi ky andar tum qutub minar dhoond rahe ho? Aisa pehla seher dekha hai humny jahan chor bhi badey amir hotey hain. Lekin yahan unka naam chor nahi, vakeel hota hai. Aapkey vakeel sabsy badey kameeny aur chor hotey hain. Yeh kanoon ky thekedaar, jo kabhi nahi hongey qiraftaar, qyunki yeh kalam ky sath kartey hain, apka balatkaar. Arey bhaiya, log khety hain ki kanoon andha hota hai. May kehta hoon, Mumbai may kanoon Gandha hota hai, qyunki har vakeel ky hath may chotta sa itna danda hota hai....."

6. That said statements are highly defamatory and brings disrepute to law profession in the eyes of general public. Said statements are towards causing utmost damage to legal profession and impugn the image of lawyers in the eyes of millions of viewers/ subscribers who visit the streaming website where said show is playing and open to all its subscribers to view.
7. That above-said scandalous statements cannot be justified by any stretch of logic reasoning whatsoever and are in bad taste. The damage caused to undersigned and by extension lawyers, cannot be measured in monetary value by any yardstick. Undersigned cannot fathom the far reaching implications of such casual, false and derogatory comments made on the show "Hasmukh" which are being allowed to stream/ play despite its character assassination that is writ large.
8. That above-said vexatious statements are a constant stigma on the good-will and unblemished image of lawyers and a constant source of annoyance for

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undersigned. Said statements have further lowered the image of undersigned in professional circles.

9. The abovesaid statements being false and unauthentic are damaging the reputation, casting aspersions on character and defaming the lawyers profession amongst the general public in the country. Moreover, abovesaid statements are deliberate and intentional attack to malign image of Nobel profession who have been engaged in providing their selfless services to every section of the society.
10. That legal profession has always been an important limb for administration of justice. Without, profession of law, the courts would not be in a position to administer and provide justice efficiently. Such an act of defaming the legal professionals among the general public in India through an online Tv series on web portals is clearly an act falling within the ambit of defamation.
11. That you the above named noticee's, are hereby called upon to immediately tender an unconditional apology stating clearly that aspersions cast by you via the Tv show "Has Mukh" are frivolous causing harm to the reputation of lawyers. You are further called upon to immediately remove/ delete/ destroy the abovesaid statements/ content from the show "Has Mukh" airing on Netflix (www.netflix.com) and cease and desist from maligning lawyers in any manner conceivable.

In case you fail to comply with the terms of the notice, we shall be constrained to initiate appropriate proceedings, both civil and criminal, against you the above named noticee's and all the concerned behind the impugned statements. Needless to mention that any such proceeding, if initiated, shall be solely at your risk as to cost and consequence.

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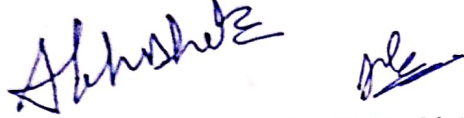
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A copy of the instant notice has been retained in our office for further necessary
action, if required.



Abhishek Bhardwaj & Hardik Vashisth

Advocates