

(BY COURIER/SPEED POST)

Our Ref: CLM1284

17th November, 2018

Mr. Kamal Anand Sharma
Flat No. 1, Wing B-1
Chand Co-operative Housing Society,
Juhu
Mumbai- 400049

RE: CEASE AND DESIST NOTICE

Dear Mr. Sharma,

We are counsels for Shri. Bhushan Kumar, son of Late Shri. Gulshan Kumar and Chairman and Managing Director of Super Cassettes Industries Private Limited, ("Our Client") and have been instructed to serve you with the present notice.

As you are aware that our Client and his father Late Shri. Gulshan Kumar are renowned names and celebrities in the music industry and the family's name is a brand in itself. Our Client's family is well-known for establishing the leading music and film production company, Super Cassettes Industries Private Limited, popularly known as "T-series". Our Client and his family over a period of several years have established a formidable reputation for their work and contribution to the Indian music and film industry and the story of their success is well-known.

It has recently come to our Client's knowledge, through various media reports and announcements that you are intending to or in the process of producing a biopic on the life and work of Late Shri Gulshan Kumar. Your interviews to the media further establish that this project is intended to be purely a commercial venture which is non-fictional and biographical in nature. Our Client asserts that you have in no manner whatsoever either informed our Client about such a venture or taken any permission from our Client or his family members to create and produce any such biopic. Ever since this announcement has been made by you, several members of the family as well as film community are constantly calling our Client to seek clarifications of our Client's involvement in such a project. To our Client's extreme inconvenience and discomfort, our Client is now having to give clarifications to all such persons, distancing himself from your project and stating that our Client never consented to any such film to be made by you.

Our Client asserts that the making of any such biopic on his family, with the central subject being his father, Late Shri. Gulshan Kumar, is in direct violation of several legal rights of our Client, both in capacity as the son of Shri. Gulshan Kumar and in his personal capacity. The production of any such biopic would entail the use of the family name, image, likeness and the identity of our Client as well as his family, for commercial purposes besides also containing details, both factual and fictional, about

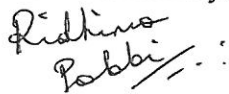
Client's family members, their lives and respective journeys all of which without the express permission of our Client and therefore is a direct violation and infringement of our Client's fundamental right to privacy and publicity rights. It is only our client who has the right and the choice to publish, publicize or disclose the life and success story of his family, more specifically his father, or permit any third party to do so. You have failed to even inform our Client about your intentions to make a biopic on his family let alone take an express permission from our Client in this regard. Your actions are clearly a ploy to piggy ride upon the well established reputation and life story of our Client and his family in order to make a commercial film based on the same, and illegally profit and gain from the exploitation of such a film.

Without prejudice to our Client's rights to initiate appropriate legal proceedings you are hereby called upon to do the following:

- (a) Issue a public statement and clarification that no biopic based on our Client or his family, more specifically his father Late Shri. Gulshan Kumar, is being created or produced by you and neither do you any such permission in this regard.
- (b) Cease and desist from claiming or making any further statements in relation to creating or producing any biopic based on our Client or his family, more specifically his father Late Shri. Gulshan Kumar.
- (c) Cease and desist from creating and producing any biopic on our Client or his family, more specifically his father Late Shri. Gulshan Kumar, without taking prior permission from our Client in this regard.

We thus call upon you to comply with the above within 24 hours of receipt of this notice, failing which our Client shall be constrained to take such further action as may be advised for the protection, enforcement and preservation of its legal rights, under applicable civil and criminal law, entirely at your costs and consequences. We also reserve our right to claim any additional relief, if necessitated.

Yours Sincerely,



RIDHIMA PABBI

[D/3491/2012]