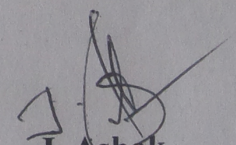


...3...

5. Our client states that the reply given under the Right to Information is contradictory to the statement made in the counter affidavit filed in the writ petition in W.P.No.8491 of 2009. Further, the Hon'ble High Court also in Para 22 of the Judgment, have considered your statement before disposing the writ petition. Thus both of you have willfully submitted untrue statement and misled the Hon'ble High Court for your personal gain and the same was exposed under the RTI Act.

6. Our client states that both of you have intentionally given false statement by an oath in the judicial proceeding, with intention to defeat the claim of our client raised in the writ petition. Having knowledge about the fact that no seniority list was ever maintained in any schools run by the management, both of you have deliberately made false statement before the Hon'ble High Court and as such you are liable to be punished under section 193 IPC for giving false statement in a judicial proceeding.

Under these circumstances, both of you are called upon to withdraw the false statement made in Para 7 of the counter affidavit filed in writ petition in W.P.No.8491 of 2009 on the file of Hon'ble High Court Madras, in writing within 15 days from the date of receipt of copy of this notice, failing which our client will be constrained to launch appropriate proceeding before the Hon'ble High Court Madras seeking punishment u/s.193 IPC and both of you will be held liable for the cost and consequences arising thereon.

  
**J. Ashok**  
**Advocate**