

Z.K. JATOI & ASSOCIATES

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THROUGH T.C.S.

27th March 2007

To,

Mr. Khalid Ahmed Memon
B-100, 16th, Feroze Nana Road,
Bath Island, Clifton,
Karachi.

Subject: NOTICE-REPLY THEREOF.

Dear Sir,

Your notice dated 6th March 2007 addressed to Mr. Dhani Buksh Jatoi and a copy whereof has been endorsed to our client, Mr. Burzin M. Pajnigara, resident of 36-Parsi Colony, Karachi and presently settled in Canada (Mississauga) has been placed in our hands with instructions to reply as follows:

At the very outset least that can be said is that it all sounds like a fairy tale or a story of cock and bull. The contents of your notice under reply is prompted by your ulterior motives to evade your own liabilities owing to me and so also Mr. Dhani Buksh Jatoi, while you were under complete control of the affairs of Fish Farm at Shujawal and also generating substantial income from the business, the profits whereof were to be shared by three of us but you always advanced the plea that instead of generating any income, losses were occasioned, which no doubt is contrary to the facts, thus you are still liable to render faithful, honest and true accounts of the business in question and pay me my due share in the profits, which you have assured in our series of

meetings while I was on my last visit to Pakistan in December 2007, I reiterate you had categorically given solemn assurances to discharge your liabilities but regrettably you failed to do so and instead resorted to extending threats and adverse propaganda to scandalize me.

I on my part in good faith in our meetings sincerely attempted to amicably resolve the entire controversy and without in any manner foregoing my claim which I still maintain and most certainly pursue by making recourse to legal remedies both civil and criminal actions before competent courts. I had attempted to bring about consensus so that the business under taken by the parties may be peacefully conducted profitably and terms and conditions were discussed at length to reach an agreement to be incorporated formally in the agreement but I regret to state from day one you had no honest intentions to discharge your pecuniary obligations. It is all the more shocking and to my utter dismay that while we were engaged in the negotiations for arriving at an amicable settlement your mischievous and cunning mind was indeed engaged in engineering in a very unscrupulous manner a well planned scheme to launch an organized campaign to defame and scandalize me and in order to attain your malafide dubious designs you had recorded the conversations, which by no means is permitted under the law, which is ex-facie calculated to blackmail me and cause harm to my goodwill and credibility. I have gathered from reliable sources that in furtherance of your illegal designs you have addressed letters to scandalize me in particular in the Parsi Community, who certainly otherwise hold me in the highest esteem. To add insult to injury you have also addressed obnoxious communications to the certain Canadian agencies and organizations (by your own admission as admitted in your notice) who are in no way concerned or connected with your dispute at any point of time. While reverting to your notice under reply, I reiterate that, it is you who can be held

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squarely and entirely responsible for not executing the agreement on the basis of the understanding reached between the parties.

Therefore, you are hereby called upon to immediately withdraw your illegal and unlawful communications sent to the Parsi Community through e-mails and the immigration authorities and also to tender unconditional apology in writing within 7 days from the date of this reply notice, failing which we have definite instructions to seek appropriate legal remedy, solely as to your risk and costs, which please note.

Thank you.

Yours Sincerely
for M/s Z. K. Jatoi & Associates

SIGNED

Z. K. Jatoi
Advocate