

1. We address you on behalf of our clients Reliance Industries Limited and Mr. Mukesh D. Ambani, the Chairman and Managing Director of RIL.
2. Reliance Industries Limited (“RIL”) is India’s largest private sector company on all major financial parameters with a turnover of INR 339,792 crore (US\$ 66.8 billion), cash profit of INR 31,994 crore (US\$ 6.3 billion) and net profit of INR 20,040 crore (US\$ 3.9 billion) as of March 31, 2012.
3. RIL is the first private sector company from India to feature in Fortune’s Global 500 list of ‘World’s Largest Corporations’ and ‘World’s Top 100 companies’, ranking 99th in terms of revenues and 130th in terms of profits in 2012. RIL ranks 68th in the Financial ‘Times FT Global 500’ list of the world’s largest companies. RIL is ranked amongst the ‘50 Most Innovative Companies - 2010’ in the World in a survey conducted by the US financial publication - Business Week in collaboration with the Boston Consulting Group (BCG). In 2010, BCG also ranked RIL as the second highest ‘Sustainable Value Creators’ for creating the most shareholder value over the decade in the world. The value of RIL’s goodwill is thus enormous even in financial terms.
4. Mr. Mukesh D. Ambani's achievements have been acknowledged at national and international levels. Over the years, some of the awards and recognition bestowed on him are:
 - Awarded the Dean’s Medal by University of Pennsylvania’s Eduardo Glandt, Dean of the School of Engineering and Applied Science in 2010 for his leadership in the application of Engineering and Technology.
 - Awarded the Indian Merchant’s Chamber (IMC) ‘Juran Quality Medal 2009’ in 2010.

- Ranked the 5th best performing CEO in the world by the Harvard Business Review in its ranking of the top 50 global CEOs in 2009
- Bestowed the US-India Business Council (USIBC) 'Global Vision' 2007 Award for Leadership in 2007.
- Conferred 'ET Business Leader of the Year' Award by The Economic Times (India) in the year 2006.
- Conferred the Degree Honoris Causa, Honorary Doctorate by the Maharaja Sayajirao University in 2007.
- Conferred the India Business Leadership Award by CNBC-TV18 in 2007.
- Received the first NDTV-Profit 'Global Indian Leader Award' from Hon'ble Prime Minister of India, Mr. Manmohan Singh in New Delhi in the year 2006.
- Had the distinction and honour of being the Co-chair at the World Economic Forum in Davos, Switzerland in 2006.
- Ranked 42nd among the 'World's Most Respected Business Leaders' and second among the four Indian CEOs featured in a survey conducted by Pricewaterhouse Coopers and published in Financial Times, London, in 2004.
- Conferred the World Communication Award for the 'Most Influential Person' in Telecommunications by Total Telecom, in 2004.
- Conferred the 'Asia Society Leadership Award' by the Asia Society, Washington D.C., USA, in 2004.

Mr. Mukesh D. Ambani is a member of the Prime Minister's Council on Trade and Industry, Government of India and the Board of Governors of the National Council of Applied Economic Research, New Delhi. The value of Mr. Ambani's goodwill can be estimated from these achievements and recognitions.

5. You, [REDACTED] are the owners of the television broadcasting channel named [REDACTED] and as a Broadcaster (as the said term is defined in Cable Television Networks Regulations Act, 1995) provide programming services. [REDACTED] channel is uplinked from and downlinked into India and telecast all over India as also all over the world by providing 'feed', to several other channels.
6. On behalf of our clients, reference is made to the press conferences called by Mr. Arvind Kejriwal and Mr. Prashant Bhushan on 31st October 2012 ("press conference 1") and on 9th November 2012 ("press conference 2"). Each of the above two press conferences were telecast by [REDACTED] all over India as also all over the world as aforesaid.
7. In the course of above press conferences, several and false and extremely defamatory statements were made by Mr. Arvind Kejriwal and Mr. Prashant Bhushan relating to our clients, amounting to very serious libel on our clients. [REDACTED] provided a platform and instrumentality for wide dissemination of the false and defamatory statements and allegations made at the said press conferences. Telecast of these press conferences amounts to permanent publication of defamatory material relating to our clients by you.
8. Our clients have instructed us to state that the remarks and allegations made during the press conferences which were telecast by [REDACTED] are false and were deliberately and recklessly made with an intent to defame our clients and to bring them into disrepute. Each of the two press conferences were telecast by [REDACTED] without making any

attempt to verify the truth or veracity of the statements and allegations being made during the press conference. Apart from having telecast the press conferences, [REDACTED] in the course of several television programmes and televised debates that followed after the said press conferences, continued to telecast, transmit and retransmit the defamatory footage of the press conferences. The publication of the defamatory material relating to our clients has been repeated a number of times on [REDACTED].

9. Our clients, say that the aforesaid action amounts to a reckless, malicious and irresponsible acts on your part and on the part of [REDACTED].

PRESS CONFERENCE - 1 ON 31ST OCTOBER 2012

- 9.1 The subject of press conference No.1 was Oil and Natural Gas business of RIL and in particular the development of Offshore Gas field, KG-D6.
- 9.2 KG-D6 is a deep water hydrocarbon block, the furthest point of which is located at a distance of approximately 80 nautical miles (150 kms) offshore the coast of Andhra Pradesh.
- 9.3 RIL was the successful bidder in respect of several blocks in the process of global tendering and consequently the rights of exploration, development and production of hydrocarbons from the said Block KG-D6 were awarded to RIL under New Exploration Licensing Policy promulgated in 1999 by the Government of India. Following the award of the aforesaid rights, a Production Sharing Contract (PSC) was entered into by RIL with the Government of India in respect of Block KG-D6. The PSC was tabled in Parliament.
- 9.4 The PSC is in the same form as adopted by several other oil and gas producing countries and is endorsed by UN agencies including the UNCTAD.
- 9.5 RIL has explored, developed and brought the field into production in record time, deploying the latest state of the art technology and equipment by deploying at its sole risk and in entirety, its own financial and technical resources. KG-D6 represents a project of which India can be justly proud
- 9.6 A litany of allegations was made in the press conference, some of which were patently false, and some of which were brazen misrepresentations and half truths of matters which are under discussion with the Government of India or in dispute in arbitration.
- 9.7 We are instructed to state that in particular our clients have taken strong exception to the absolutely false and defamatory statements relating to pricing of natural gas. It is in the context of preparation of complete and efficient Development Plan for the field that we approached the Government with the proposed indicative price commencing from 2014 when, even according to the Government, the current price of gas is to end.
10. Our clients have instructed us to state that apart from the foregoing, *inter-alia*, the following false and grossly defamatory statements made by Mr. Arvind Kejriwal and/or Mr. Prashant Bhushan were telecast and repeated several times by [REDACTED] subsequently, without any attempt to verify the truth or veracity thereof:

".....But in 2007 an EGOM under Pranab Mukherjee, the government agreed to their terms and gave them gas at a price of \$ 4.25 per till 2014 Why did the government agree to hike from \$2 to \$ 4.25? Is it not that there are all social

workers in the government. And why did they benefit Reliance. May be Reliance at some point must have filled the pockets of some of the ministers...."

".....However, Reliance started blackmailing, they cut down the production. Instead of producing 8 crore units they used to supply 2 crore units and they said the gas will be available only at US\$ 14.25.... Take it or leave it. Because of high handed approach of Reliance 9000 MW power plants are almost closed and hence they are ideal. If they import gas... the prices are so high that it will become uneconomical to sell the electricity. Reliance cut the production of the gas and started hoarding it like rice, dal, wheat... done by 'dalals'....."

".....The contract was signed by the BJP in 2000 with Reliance. The contract is very interesting. In any business when cost increases it is natural that the profits will come down but this is a new type of a contract where profit increases with the increase in the costs and profit will increase many times... and costs will be determined by Reliance....."

".....CAG said that the costs are inflated and there is no need to charge such costs. There is a fear that the expenditure of Rs. 10 is shown as Rs. 100. It is interesting to note that Reliance has purchased all materials from only one or two companies. Most of them are single tender contracts and we will provide you the list in a while. What relation Reliance has with these supplier companies? Is it a case where you give money to the company and it will return the same through back door?...."

".....It is like I keep a driver to drive a car and he sells my car tomorrow. The 30% stake in 29 gas fields were sold in Rs. 35000 crore and Indian government approved it. It seems like Indian government is their agent and the country is not run by Manmohan Singh but by Mukesh Ambani. Mukesh Ambani had said that Congress is our shop, it is very true.. nothing wrong in it....."

".....They were supposed to drill 31 wells but only 13 are operational now. Why? Because they are hoarding it and they will produce when price will be raised to US\$ 14.25.... and government is helpless...."

".....This scam is similar to the coal scam...."

"..... The continuous stances by Jaipal Reddy angered Mukesh Ambani and in the process got Jaipal Reddy removed...."

"....When Petroleum Minister has to be appointed, Reliance does it."

".....We demand that the all blackmailing and high handed tactics used by Reliance be put an end to as the country will no longer tolerate the same, We demand the contract with RIL in Krishna-Godavari basin be scrapped and given to Oil India and ONGC - so that the country should get the most gas at the cheapest rates...."

".....What we are exposing today is not on an individual but on the working system of the country. Crony capitalism has spread its tentacles far and wide in

the country Today not only decisions on policy, law and decisions like prices of gas etc Decisions are far from being dictated by public interest are being dictated by the commercial industrialists of crony capitalists like Reliance. Loot has gone to such an extent that from this loot, some crony capitalists have become so powerful that they have acquired decisions of the country so much so that they not only decide government policies but they even decide who will be in cabinet.....”

“.....It's absolutely clear that all this is being done because crony capitalists are greasing the palms of those involved. Those who resist, like Mani Shankar Aiyar and Jaipal Reddy, are unceremoniously shunted out of those portfolios which are of interest to these people.....”

“.....Therefore that also shows this kind of Gold Plating as it is called where in for doubling the production they are saying our cost will be quadrupled.....”

“.....Because of this that he has been transferred and these documents show that. Unequivocally established that he was fighting Reliance truth and nail that the Prime Minister in fact had been intervening on behalf of Reliance or virtually on behalf of Reliance asking for the matter to be referred to the opinion of the attorney general , then asking for the matter to be referred to the EGOM etc when normally the views of the petroleum ministry should have been final in this matter but yet every effort is today also being made to somehow get the EGOM to revise the prices.....”

- 10.1 It was your duty as the Broadcaster to verify the truth and veracity of the statement and allegations made during the course the said Press Conference. We are instructed to state that without making even a semblance of effort to verify the truth ██████████ telecast, not once but repeatedly, several false and grossly defamatory statements and allegations relating to our clients in a malicious and irresponsible manner.

PRESS CONFERENCE - 2 ON 9TH NOVEMBER 2012

- 11 The second press conference of Mr. Arvind Kejriwal and Mr. Prashant Bhushan related to “black” money and certain bank accounts in HSBC Bank in Switzerland.
- 11.1 In the course of the second press conference, *inter - alia*, the following false and grossly defamatory statements and allegations amounting to extremely serious libel were made relating to our clients:

“...Mukesh Ambani has Rs 100 crore as on December 2006 in Switzerland's Swiss account,

“... Why Ambani was not raided? Why was Mukesh Ambani not raided?...”

“.....If statements were taken of Mukesh Ambani and Anil Ambani, if they were raided then they should tell how Rs 100 crore reached Geneva from India. Is it through banking channel or whether Rs 100 crore was given as cash which got deposited there? How did this bank account operated?...Ambani brothers are also doing hawala, are they involved in hawala. This is a very serious matter.....”

".....The second thing is Rs 100 crore was in December 2006. If they have given tax for Rs 100 crore that means they have accounts, so we should ask details for the accounts. When it was opened, what all transactions happened till now, how many people they have bribed from those accounts?....."

"....Government of India is protecting the criminals...."

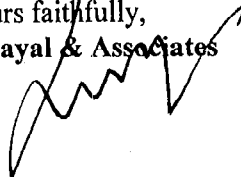
".....But what it points out is the sheer scale of illegality involved, the sheer scale of cover-up at the higher level of the government involved, the role of these crony capitalists and these powerful people like Ambani who as we pointed out in our last press conference are today sitting on top of the entire ruling establishment of the country and the entire ruling establishment is working at their behest...."

- 11.2 Our clients have instructed us to state that the allegations made in the press conferences are false, malicious and grossly defamatory of our clients. The said false and defamatory statements and allegations were telecast and repeated several times by [REDACTED] without making any attempt whatsoever to verify the truth or veracity thereof.
12. The said telecasts of false and grossly defamatory material by [REDACTED] has defamed, maligned and brought our clients to disrepute all over the world.
13. Our clients have instructed us to state that IBCPL is bound by the Guidelines for Uplinking and Downlinking from India dated 5th December 2011, issued by the Ministry of Information & Broadcasting, Government of India. Our clients have instructed us to state that since [REDACTED] channel is a news and current affairs TV channel, the provisions of the Uplinking and Downlinking Guidelines apply to IBCPL, which *inter - alia* provide that a Company, like IBCPL, which runs a news and current affairs TV channel, is obliged to comply with the Programme Code as laid down in the Cable Television Networks (Regulations) Act, 1995, and the Rules framed thereunder.
14. Our clients have instructed us to state that in telecasting the aforesaid press conferences and repeating the false and defamatory material relating to our clients in the manner aforesaid IBCPL is in complete violation of the said Uplinking Guidelines, and the said Downlinking Guidelines as also in complete and material breach of the Programme Code prescribed under the Cable Television Network Rules.
15. In the circumstances aforesaid and without prejudice to any of our clients' rights and contentions, our clients hereby demand a retraction and an unconditional apology in the form approved and acceptable to our clients for having published and disseminated false and grossly defamatory material relating to our clients. Please note that if we do not receive a draft of the aforesaid apology and retraction within three days from the receipt hereof by you, our clients will assume that in spite of this communication, you do not propose to publish any apology and retraction.
16. Our clients have further instructed us to categorically inform you and give you this notice that any further publication broadcasting or disseminating any defamatory material relating to our clients including repetition of the material already broadcast by [REDACTED] or any other similar broadcast will constrain our clients to adopt such proceedings, both

civil and/or criminal as they may be advised against you and all persons responsible for dissemination of defamatory material relating to our clients.

17. Please note that this communication is being addressed to you without prejudice to any of our clients' rights and contentions.

Yours faithfully,
A. S. Dayal & Associates



Proprietor