

- S.A.H. RAZVI
 - ARIF PASHA
 - B.M. CHANNAMALLIKARJUNA SWAMY
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To,

1. BENNETT COLEMAN AND COMPANY LIMITED,
A Company registered under the Indian Companies Act
Having its registered office at,
Times Of India Building,
DN Road,
Mumbai,
Maharashtra-400001
2. Vineet Kumar Jain,
Managing Director,
Bennett Coleman And Company Limited
Times Of India Building,
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Mumbai,
Maharashtra-400001
3. Jaideep Bose,
Editor-in-Chief,
Bennett Coleman And Company Limited
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4. Akrita Reyar
Chief Editor(Digital)
Bennett Coleman And Company Limited
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Maharashtra-400001

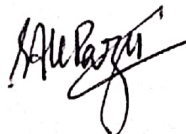


Under instructions from our client, Hafeezulla Khan S/O Ismail Khan, Residing at #17, 6th cross, Kempaiah block, J.C Nagar, Bangalore-06, we are issuing this legal Notice to you.

1. Our client is a member of the Tablighi Jamaat. The Tablighi Jamaat is one of the largest Islamic Movements in the world. The organisation has always cooperated with the authorities and has had absolutely no run-ins with the law in over 100 years of its existence. All its members are law abiding and the tablighi Jamaat has neither encouraged nor supported and has in fact opposed any violation of law by any person or organisation. Tablighi Jamaat is an apolitical socio-religious movement working

with the Muslim community across the world for increasing their awareness of basic principles of Islam and Prophetic traditions and enable Muslims to live as honest and responsible citizens of the countries they live in.

2. The Tablighi Jamaat from its inception has worked closely with establishment and law enforcement agencies and all its programs are organized and conducted with due permission from the relevant authorities in a cordial atmosphere.
3. You have published a highly defamatory and inflammatory article on your website, <https://www.timesnownews.com/india/article/tablighi-jamaat-shares-links-with-terror-outfits/572176> , on April 1, 2020 titled '*Tablighi Jamaat shares links with terror outfits*'.
4. In the Article you have asserted that *the Tablighi Jamaat has had a long history of ties with Pakistan-based banned terror outfits like Harkat-ul-Mujahideen*. It further says that *the original founders of Harkat-ul-Mujahideen (HuM), the terror group known for the hijacking of Indian Airlines Flight 814 in 1999, were members of Tablighi Jamaat, as per Pakistani security analysts and Indian investigators*. This is a baseless and malicious allegation as the Tablighi Jamaat has never been the subject of any investigation for any connection to terror activities.
5. The article makes the allegation that *as per intelligence estimates, over 6,000 Tablighis were trained in HuM terror camps in Pakistan*. This again a malicious attempt to link the Tablighi Jamaat to the HuM when in reality there is absolutely no relation between the two.
6. Your article mentions that *as per WikiLeaks documents, some of the 9/11 al-Qaeda suspects detained by the US in Guantanamo Bay had stayed in the premises of the Tablighi Jamaat in Nizamuddin West, New Delhi, several years ago*. This is a malicious and baseless attempt to unnecessarily link the suspects to the Tablighi Jamaat without any proof of their relationship. Our client maintains that the Tablighi Jamaat not only has no relations with any terror organisation but unequivocally condemns all acts of terror across the world in the harshest possible terms.
7. Your article also mentions that *incidentally, Tablighi Jamaat was also suspected to be involved in the burning of 59 Hindu Kar Sevaks in the 2002 Godhra train torching incident in Gujarat, which led to communal rioting in the state that claimed several lives*. It is important to note that there is not even a single mention of the Tablighi Jamaat in the 176 page report submitted by the Nanavati Commission appointed to investigate the Godhra train burning incident.



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8. In the said article you have further alleged that *according to an article written by India's intelligence official and security expert late B. Raman, the branches of the Tablighi Jamaat in Pakistan and Bangladesh "gained adverse attention from time to time for association with jihadi terrorist organisations such as the Harkat-ul-Mujahideen, the Harkat-ul-Jihad-al-Islami, the Lashkar-e-Taiba and the Jaish-e-Mohammad, which are members of the International Islamic Front For Jihad Against the Crusaders and the Jewish People formed by the late Osama bin Laden in 1998." Quoting Pakistani newspaper reports from the 1990s, Raman pointed out that the trained cadres of jihadi terrorist organisations like HuM obtained visas by posing as preachers of Tablighi Jamaat and went abroad to recruit young Muslims for terror training in Pakistan.* It is asserted by our client that all these assertions made by you are a tissue of lies. Our client reiterates that the Tablighi Jamaat not only has no relations with any terror organisation but unequivocally condemns all acts of terror across the world in the harshest possible terms This is a deliberate attempt by your article to create enmity against the Tablighi Jamaat in India.
9. The article then says, *Since millions of Tablighi Jamaat proselytisers travel around the world preaching Islam, much on the lines of the radical Wahhabi-Salafist ideology, the Jamaat developed a large following in Chechnya and Dagestan areas of Russia, Somalia and some other African countries. Raman in his article wrote that "intelligence agencies of all these countries suspected that terrorist organisations based in Pakistan were using the cover of preaching for creating sleeper cells in Muslim communities of different countries." As a result, Tablighi Jamaat was black-listed and its preachers were denied visas.* We would like to point out that these statements are highly offensive and malicious. The Indian Tablighi Jamaat has never been accused of any wrongdoing nor has it ever been the subject of any investigation. It has never been blacklisted nor has it ever been remotely accused of helping any terrorist organisation. The said assertions are made to further malign the Tablighi Jamaat and promote hatred and enmity towards all members of the Tablighi Jamaat putting our client in immense danger.
10. The above article therefore is not only defamatory but is also designed to cause maximum damage to the reputation of our client and promotes enmity and hatred towards all members of the Tablighi Jamaat putting them at the risk of violence.
11. We therefore call upon you to immediately publish an unconditional apology stating clearly that Tablighi Jamaat has no links to any terror organisation on a prominent place on your website.
12. In addition we call upon you to pay liquidated damages in a sum of Rs. 1,00,00,000/- (Rupees One Crore only) to our client for the horrible mental agony caused to our

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client claiming and insinuating that the Tablighi Jamaat of which, our client is a member has indulged in any activity which violates any law as stated in your article failing which our client will initiate legal proceedings against you to ensure that the apology is published and a sum of Rs. 1,00,00,000/- (Rupees One Crore only) is recovered from all of you jointly and severally at your cost and risk.

13. Please take note that our client is filing separate criminal case for criminal defamation Under Section 499 of IPC.



A handwritten signature in black ink, appearing to read "Saurabh", is written over a diagonal line.

ADVOCATE

Bangalore:
Dated: 05-04-2020