Dated- 22.04.2023

Through- Speed Post/WhatsApp/Email

To,

1. Mr. K K Radhamohan

Director Sathya Sai Arts Hyderabad (Producer for upcoming Movie Ruslaan) Email- <u>shrisathyasaiarts@gmail.com</u>

2. Mr. Katyayan Shivpuri

(Director for upcoming Movie Ruslaan)

3. Ayush Sharma

(Lead Actor for upcoming Movie Ruslaan) Email- contactaayushsharma@gmail.com

4. Shshrii Mishraa

(Lead Actor for upcoming Movie Ruslaan)

5. Jagapathi Babu

(Lead Actor for upcoming Movie Ruslaan)

Subject: Legal Notice for violation of right of owner and copyright infringement for the Movie Ruslaan

Dear Concern/s,

I Rudra Vikram Singh, Advocate, Supreme Court of India under instructions and on behalf of my client Shri Jagdish Sharma and Rajveer Sharma office at 48, Gole Building, Dharam Marg, Chanakyapuri, New Delhi do here by serve you with the present Legal Notice in the following manner.

- 1. That my client Shri Jagdish Sharma is well known Political Leader, Social Activist and Producer of the Movie Ruslaan which was released in theaters across India on 11th September 2009 and my client Shri Rajveer Sharma was the Lead Actor in the opposite of lead actress Megha Chaterjee (Daughter of legend actor Moushmi Chaterjee) along with many legend actors of Bollywood like Shahbaz Khan, Ganesh Yadav, Asrani, Smita Jayakar, Rajendra Sharma, Rajan Sharma, SM Zaheer, Shabnam Kapoor and Prithvi Jyutshi etc.
- 2. That the songs of this movie Ruslaan were sung by famous singers like Sunidhi Chauhan, Javed Ali, Master Salim, Sadhna Sargam and Hariharan and music was given by Raees. Famous Bollywood choreographer Shabina Khan choreographed the songs of this film.
- **3.** That the music release of the Movie Ruslaan was done in New Delhi and many big actors, cricketers and political veterans like Kapildev, Mohammad Azharuddin, Madanlal, actress Moushumi Chatterjee, Gurmeet Choudhary, Debina Bonnerjee, Shaleen Bhanot, MS Bitta had attended the release. The music release of the film Ruslaan was done in the great presence of the then Chief Minister Sheela Dixit.
- **4.** That the said Movie Ruslaan did well on box office and my Client Shri Rajveer Sharma was much appreciated by the critics for his tremendous acting.

- 5. That my client Shri Rajveer Sharma is still working in the industry and in next month he is coming with his next project Apni Mohabbat.
- **6.** That my clients are also planning to launch the said Movie Ruslaan on OTT Platform and talks related to the same are in progress with OTT Platforms.
- 7. That it was the utter surprise to my clients when on 21st April 2023 they saw the release of the teaser of a Movie with the name Ruslaan directed by the you the Noticee No. 2 and produced by the Noticee No. 1 and you the Noticee No 3 to 5 are in lead role in the said upcoming movie.
- 8. That in the teaser one dialog can also be heard "Mai Ruslaan ko bachpan se janti hun." Which is also exactly the same dialog in my clients original movie Ruslaan. From the dialog and teaser it seems that the Name of Lead Character is Ruslaan which is again reflects the similarity of my clients original movie Ruslaan.
- **9.** That from the teaser of the said upcoming movie Ruslaan it is quite clear that not only the name of my clients movie is being used illegally by you the Noticees but the dialogs and stories are also copied from my client's original movie Ruslaan which is clear violation of the right of the owner and copyright infringement. Also if the said movie will be released with the

same name Ruslaan for which my clients have all the legal rights, my clients will be in huge loss as they are in planning to launch their original Movie Ruslaan on OTT platform but if the Movie with this name will be released by you the Noticees my clients will face a big loss as you all are the big people of the industry and the lead actor is the Brother in law of Salman Khan in the said upcoming movie who has great impact in Bollywood industry.

10. That in the above circumstances my clients have all the rights to take legal action against you the Noticees in case the name Ruslaan not get dropped by you the Noticees after receiving this Legal Notice.

> I therefore in terms of facts and circumstances stated above advice you to withdraw the Teaser released on dated 21.04.2023 for the upcoming Movie Ruslaan and drop the Name Ruslaan for your upcoming movie within 7 days of receiving this Legal Notice and do not use any dialog, story line of my clients original movie Ruslaan, otherwise my client shall be constraint to approach the appropriate Court or forum for the redressal of his grievances. In case my client approaches any court or forum you shall solely be responsible for the same and would have to bear the entire litigation cost over and above the expenses of Rupees 22000 incurred in serving you with the present legal notice/reply.

A copy of this legal notice/ reply has been retained in my office for further necessary action. You will ignore this notice at your own risk & cost.

Thanks!

Regards,

Rudra Vikram Singh Advocate Office- 33 C, Pocket A, Mayur Vihar Phase- 2, Delhi-110091 Mob- +91-9873425354 Email-rudravikrams@gmail.com

Copy to 1. Jagdish Sharma 2. Rajveer Sharma