



NATHAN &
ASSOCIATES
—your friend-in-law—

14.08.2021

To,

1. Pa. Ranjith,
Film Producer,
M/s. Neelam Productions
Manohar Ave, Sulaiman Zackria Avenue,
Egmore, Chennai,
Tamil Nadu – 600008.
2. Mr. Tamizh Prabha,
Co-writer – Sarpatta Parambarai,
Manohar Ave, Sulaiman Zackria Avenue,
Egmore, Chennai,
Tamil Nadu – 600008.
3. Shanmugam Dhakshanraj
Co-producer
Manohar Ave, Sulaiman Zackria Avenue,
Egmore, Chennai,
Tamil Nadu – 600008.
4. M/s. Amazon India,
Rep. by its Authorized signatory and
Director of Productions,
#40,3rd Floor, SP Infocity M G R Salai,
Perungudi Kandanchavady,
Chennai-600096

Also at :

Amazon Development Center India Pvt Ltd.,
Rep. by its Authorized signatory and
Director of Productions,
Brigade Gateway, 8th floor, 26/1, Dr. Rajkumar Road,
Malleshwaram(W), Bangalore-560055,
Karnataka, India



Sir/Madam,

Under the instructions from our client Mr. R. M. Babu Murugavel, Ex M.L.A, S/o. Mr. Mannu, residing at No. B-38, 9th Floor, Tower Block, Taylors Road, Kilpauk, Chennai - 600 010, we would like to issue the below legal notice to you as follows:

1. Our Client is basically a Social activist who goes by the virtue of truth and change, he has been in the forefront of many social and political movements and protests and has been a vital catalyst for social upliftment. His reputation in the society is backed by the tireless and commendable work which he performed as a member of Legislative Assembly and the issues which he took and handled with professional and political integrity.

2. Our Client states that he is very much keen in continuously elevating his knowledge towards History of India, Politics of India and the State of Tamilnadu and in which sense he is used to watching feature films which comes out of Historical genre, in such case as the 1st and 4th of you had promoted the feature film 'Sarpatta Parambarai' as historical / time line and cultural film of Tamilnadu, he watched the same directed by the 1st of you, co-written by both 1st and 2nd of you, co-produced by 1st of you under the banner Neelam Productions along with 3rd of you - K9 Studios. It is observed and brought to our notice by our client that certain facts portrayed in the film is totally inaccurate and induced the sense of misleading the public at large with events and incidents without material proofs.

3. Our Client states that in the feature film, all of you had jointly and severally portrayed and narrated a misleading fact as if "*Chief ministers son was also arrested under the Maintenance of Internal Security Act (MISA)*", this line had triggered our client to go back to the history and to find the base and circumstance of timeline, it is identified that Mr. M. Karunanidhi the then CM is mentioned in the film as Chief Minister and his Mr. M.K. Stalin the present CM is mentioned as his portrayed as his son in the film, It is pertinent

to mention that this sequence come up *after the fight between Mr. Arya and Mr. John Kokken, there surfaces a sequence describing the emergency situation prevailing at that time and moves further to state that under the MISA act passed in 1971, along with the then Chief Minister Mr. Karunanidhi, his son Honorable Chief Minister Mr. M.K. Stalin was also arrested under the act (1:45:17 in the movie)*. It is further stated by our client that there are also other instances in the film where there are false propaganda's and politically motivated verses in favour of the present ruling government of Tamilnadu.





4. Our Client states that this created a urge for him to lean upon the history and to retrieve some crucial facts about the *Maintenance of Internal Security Act* and the leaders who were arrested under the said Act, wherein it is identified that there were no such incident of arrest of Mr. M.K. Stalin under the MISA act and this unfairly puts spotlight on Mr. M.K. Stalin and this particular scene has the potential to seed this *FRIVOLOUS FACT* on the innocent people who are unaware of the then politics, the act and the persons who are arrested under the said Act. Further this plot as mentioned in the Feature film may also tend to downplay the sacrifice and contribution of other people who had truly been arrested under an inappropriate objective and to add the source of Wikipedia had mentioned that *"The legislation gained infamy for its disregard of legal and constitutional safeguards of civil rights, especially when "going all the way down" on the competition, and during the period of national emergency (1975-1977) as thousands of innocent people were believed to have been arbitrarily arrested, tortured and in some cases, even forcibly sterilized."*

5. Our Client further states that to corroborate his statement even further, he has also put forth the fact that Mr. M.K. Stalin's name did not appear in Mr. Justice Shah Commission's report which commission published its report on the illegal events during the emergency and the persons responsible in three volumes totaling around 525 pages, The commission concluded that during Emergency the provisions of the Maintenance of Internal Security Act and the Defence of India Rules were not followed but were abused in order to damage political opponents.

5. Our Client further states that, the said report above is the only dossier available to prove the number and name of persons who are arrested in the said timeline, as this apparently proves that Mr. M.K. Stalin the present CM of Tamilnadu is not a part of arrest, apart from this there is no concrete proof and evidence as to the arrest of Mr. M.K. Stalin other than word of mouth and messages passed on by propaganda persons in the Political parties. Further as mentioned in the Report *"The decision to arrest and release certain persons were entirely on political considerations which were intended to be favorable to the ruling party. Employing the police to the advantage of one party is a sure source of subverting the rule of law"*.

6. Our Client further states that apart from the above there are also other controversies and confusion involved as to whether Mr. M.K. Stalin was really arrested under the MISA act or not. Even though it is also widely discussed among major Tamil dailies and news channels and has been a constant topic of discussion begging clarity on the same, this argument further takes depth as Mr. M.K. Stalin himself as admitted in a TV show that he did not read Shah commission's report and does not know that his name did not feature in the report. While there were several incidents of DMK cadres and Mr. M.K. Stalin himself claiming to prove the incident, it has been futile bringing in more ambiguity and controversy on the arrest or the topic.



7. Our Client is also disappointed that when there are several editors and top managing persons who vet the content and the script is taken for approval to the Panel of Cine Experts with the online platform Amazon Prime Video the 4th party herein, which has gained reputation and immense subscribers to its platform, the act of social responsibility to check facts and circumstances before release of the film is imminent and extremely crucial with movies which portray real events. It should also have known that this topic is of wide discussion and the incident as to whether Mr. Stalin was arrested or not is not settled yet. Our Client further feels that the 4th of you has foregone the responsibility, which is the primary obligation for any media company to hold towards its subscribers.

8. Our Client states this inaccuracy will seed wrong fact in the minds of unaware audience and may result in writing the wrong and fallible history in future. As the 1st to 3rd parties have an inherent responsibility to portray the correct facts and not in any way to mislead the public, this feature film had portrayed facts which are concocted in nature and it might lead to be a precedent to promote false political news with ulterior motive to distort facts to suit their ideology and might create disharmony and unrest in public forums. Further Sec. 505 of the Indian Penal code states as under:

Statements conducing to public mischief:

(1) Whoever makes, publishes or circulates any statement, rumour or report:—

(b) with intent to cause, or which is likely to cause, fear or alarm to the public, or to any section of the public whereby any person may be induced to commit an offence against the State or against the public tranquillity; or

(c) with intent to incite, or which is likely to incite, any class or community of persons to commit any offence against any other class or community, shall be punished with imprisonment which may extend to 6 [three years], or with fine, or with both. (2) Statements creating or promoting enmity, hatred or ill-will between classes.—Whoever makes, publishes or circulates any statement or report containing rumour or alarming news with intent to create or promote, or which is likely to create or promote, on grounds of religion, race, place of birth, residence, language, caste or community or any other ground whatsoever, feelings of enmity, hatred or ill-will between different religious, racial, language or regional groups or castes or communities, shall be punished with imprisonment which may extend to three years, or with fine, or with both.





NATHAN &
ASSOCIATES
—your friend-in-law—

-5-

Hence it is hereby called upon all of you jointly and severally to provide

i. Authenticated documentation on the dialect and context mentioned in Para 3 of this legal notice or to remove such unauthenticated fact and information circulated through the Feature film and make necessary revision to show the true facts and events with circumstantial and evidentiary proof.

ii. Also, to widely publish in all leading news dailies in English and in Vernacular language across India mentioning that the content "Chief Minister son was also arrested under the Maintenance of Internal Security Act (MISA)" as portrayed in the Feature film as misleading and wrongly depicted without any material proofs.

within 48 hours from the date of receipt of this legal notice failing which our client would be constrained to initiate Civil and Criminal proceedings by filing appropriate petitions of injunction, criminal proceedings u/Sec. Section 505(1) of IPC and for circulating such false political propaganda through the medium of Feature film mulcting the costs and consequences thereupon.


(D.O. Kaviyanathan)

M/s. NATHAN AND ASSOCIATES
ADVOCATES
Old No.41/New No.83,
Armenian Street, "Mubarak Manzil",
II Floor, Parrys, Chennai – 600 001.
Ph : 044 - 42166557