

LEGAL NOTICE

BY S.P.A.D

To

1. Mr.V.Venkateshwar Rao (V.V.Rao)
s/o V.Chalapathi Rao
Vice President Janachaitanya Vedika
6-1-68/4/1, Second Floor, Lootharan Church Rd,
Lakdikapool, Hyderabad - 500 004

R/o.HIG-155, Phase - V,
K.P.H.B. Colony
Kukatpally, Hyderabad - 500 072

2. Mr.V.Laxman Reddy
s/o V.Venkat Subba Reddy
1-2-212/1/c/2/B, 12th Street,
Gaganmahal Road, Domalguda,
Hyderabad - 500 029

3. Mr.Arunkumar Kankipati
s/o Sri.K.Mohan,
Flat # 23, Neeladri Apartments,
Tilaknagar, Hyderabad - 500 044

4. Mr.Yagati Vasavya
s/o Sri.Yagat Kanaka Rao
2nd Floor, 8-3-231/A-66,
Sri Krishna nagar, Yousufguda,
Hyderabad - 500 045

Sir,

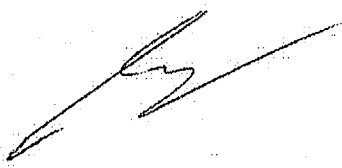
Under the instructions of my client Electronics Corporation of India Limited the following legal notice is being issued to you:

1. My client is a reputed public sector undertaking engaged in the business of manufacture of electronic products since 40 years. My client has developed electronic components for several major projects of national and



strategic importance such as Space Programs, Defence, Nuclear, Communication and security sectors.

2. My client with all the expertise has taken up the Electronic Voting Machine (EVM) project which is of national interest. To start with EVMs have several advantages:
 - i. saves trees as the conventional ballot papers required for the present day electoral strength of 714 millions of voters is enormous;
 - ii. EVMs have a life time of 15 years and if the multiple use of the EVMs is taken into account the expenditure on the elections is reduced drastically; It completely eliminates invalid votes.
 - iii. Enables quick declaration of results within hours of counting.
 - iv. Ensures full integrity of voting data.
 - v. Battery operated and hence no needs of power supply.
 - vi. Light weight and small in size for easy transportation to Polling Booths.
3. My client states that the success of the EVMs is applauded internationally and my client is now supplying the EVMs to other countries.
4. My client states that you have approached the Hon'ble Supreme Court with allegations against the EVMs in a public interest litigation wherein the Hon'ble Supreme



Srinivas Chitturu

ADVOCATE

B.Sc., B.L.

Phone :+91-40-2756 4932

Fax :+91-40-2756 2431

E-mail : hyd1_vikram1@sancharnet.in

3-4-533, BARKATPURA,

HYDERABAD - 500 027.

ANDHRA PRADESH, INDIA

Court has observed that your grievances can be placed before the Election Commission.

5. My client states that your allegations against the EVM even before the Hon'ble Supreme Court in your affidavits are to be categorized as false statements as you never had an opportunity to experiment on the EVM as the same are not available any where openly in the market. This clearly shows that your approach to the Court of Law is only to abuse the process of law.
6. My client states that the Election Commission of India having given a notification given opportunity not only to you people but also to public in general calling upon to take an opportunity to examine the EVMs randomly picked from 10 states and to prove or establish any scope for tampering. My clients states that apart from the other expert members, officers of my client were also made available at the Office of Election Commission to clear any of your doubts and to assist you to experiment on the EVM made available to prove your allegations.
7. My client states that you have failed so far to establish any of your allegations being made against the EVMs such as "TAMPERABILITY" OR "VULNERABILITY". Further my client states that you have not even made an acceptable scientific approach to establish your allegations against EVM.
8. My client further states that having failed in establishing your allegations; you were demanding



Srinivas Chitturu

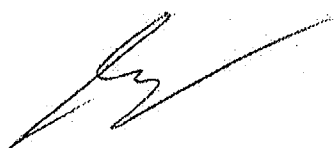
B.Sc., B.L.
ADVOCATE

Phone : +91-40-2756 4932
Fax : +91-40-2756 2431
E-mail : hyd1_vikram1@sancharnet.in
3-4-533, BARKATPURA,
HYDERABAD - 500 027.
ANDHRA PRADESH, INDIA

officers of my client to furnish the source code and other technical details which are the Intellectual Property of my client. My client suspects the technical expertise of the 3rd and 4th of you and apprehending that you were only trying to take advantage of the Public Interest Litigation method to procure the source code and other IP details which have gained commercial value over a period of time.

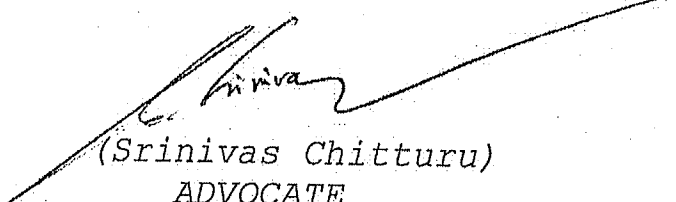
9. My client states that you have tried to build a prototype of the EVM manufactured by my client for exhibiting to the public. My client states that except for an external look alike you could not make the machine work exactly like the EVM of my client as you do not have the source code or machine code. Evidently for lack of the said source code you could not build an EVM with similar functionality as that of my client. My client states that by building a look a like of my client machine you have also violated the Intellectual Property Rights of my client pertaining to Patent and Design of EVM which are registered with the authorities in India.

10. My client states that you have built the look alike of EVM manufactured by my client with the objective of to misleading the public and creating wrong notions in their minds. My client states that by doing so you have not only misled the public but also created an impression in the minds of the public that ECIL is engaged in manufacture of goods of inferior and



manipulative quality and thereby deliberate vilification of the stature of my client in the public. My client states that your endless and baseless vilification of the EVM is causing loss of reputation to my client.

11. My client reliably learnt that you have some vested interest for commercial exploitation of EVMs and being unable to achieve your business objectives you are trying to misrepresent in the public regarding the EVMs of my client and trying to force my clients to yield to your demands.
12. My client calls upon you to unconditionally apologize publicly for all the false uproar created by you in the public. My client also calls upon to surrender all the prototype machines build by you for the purpose of your false propaganda which are a look alike of my client's machines as the same are violating the patent and design of my client. My client states that you people in the garb of an NGO like "Jana Chaitanya Vedika" are exploiting innocent public to achieve your illegal objectives.
13. My client states that failing to comply with the above demands of my client my client will be constrained to initiate criminal and civil action against you for your misdeeds of defaming my client and misleading the public.


(Srinivas Chitturu)
ADVOCATE