

**WADIA GHANDY & Co.**  
**ADVOCATES & SOLICITORS**

Estd. 1883

\* NOSHIR J. SETHNA  
HAMID A. MOOCHHALA  
DJENA B. SUNAVALA  
MARYLOU A. BILAWALA  
ASHISH A. AHUJA  
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SAUMIL R. VASAVADA  
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XERXES N. ANTIA

\* NOTARY

DJM-HC-10082 / 8951/10

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26<sup>th</sup> October, 2010

**BY HAND / BY EMAIL / BY FAX / BY COURIER / BY REGD A.D**

To,  
The Assistant Passport Officer (Policy)  
Regional Passport Office,  
Mumbai

Reference: Your letter no F7(5) 10- D -4399/10-572-Pool-1 dated 15/10/2010  
("letter under reference")

Subject: INTERIM REPLY

AND

AN APPLICATION SEEKING THE FOLLOWING:-

- (i) Supply of all information, communications and documents ("material") referred to and/or relied upon, in your letter.
- (ii) Supply of any other "material" not mentioned in your letter, which you consider relevant.
- (iii) Grant of a reasonable period of two weeks, from the date of supply of the "material" mentioned in (i) and (ii) above, to respond to your letter.

Sir,

We act for Mr. Lalit K. Modi who has placed in our hands the letter under reference with instructions to respond thereto as under:

1. The letter under reference was delivered at Nirlon House, Dr. Annie Besant Road, Worli, Mumbai, on 19<sup>th</sup> October, 2010. The letter under reference was received by the security staff on duty: the Modi Group companies having shifted their operations to new premises at Andheri (East). Our client sighted a copy of the letter on 20<sup>th</sup> October, 2010.

BRANCHES :

AHMEDABAD : WADIA GHANDY & CO. (AHMEDABAD) 1ST FLOOR, CHANDAN HOUSE, NEAR MAYOR'S BUNGLOW, LAW GARDEN, AHMEDABAD 380 006. TEL.: 91-79-26564700/4800 FAX: 91-79-26564300  
BANGALORE : WADIA GHANDY & CO. (SOUTH) 9TH FLOOR, VAYUDOOOTH CHAMBERS, 15-16 M. G. ROAD, BENGALURU 560 001. TEL.: 91-80-41233127/28 FAX: 91-80-41233129  
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2. The letter under reference calls upon our client **“to explain as to why action under Section 10(3)(c) of the Passports Act, 1967 should not be initiated against you”**. The letter under reference also states that “ if you wish, you may appear before Assistant Passport Officer (Policy) to represent your case in person, **within fifteen days from the date of issue of this letter along with passport bearing No. Z-1784222 dated 30.07.2008**. If no reply is received within the stipulated period, necessary action under the Passports Act, 1967 will be initiated against you by this office.”
3. As an esteemed and responsible public servant, your good self is undoubtedly aware that even the institution of proceedings under Section 10(3)(c) of the Passports Act, 1967, is something which ought to be resorted to with great circumspection. The power and/or jurisdiction under Section 10(3) of the Passports Act, 1967 has far reaching consequences upon the fundamental rights of a citizen and any order passed under Section 10 (3) of the Passport Act, 1967 entails a serious infringement and abridgement of a citizen’s liberty. It is therefore imperative that before any proceedings are instituted and a Show Cause Notice under Section 10(3) of the Passports Act issued, your good self should be satisfied that there exists material to warrant doing so.
4. While your good self has been kind enough to seek our client’s response even at this threshold/initial stage, it is our request that even at this initial/threshold stage the principles of natural justice be scrupulously followed before arriving at a decision on whether a Show Cause Notice instituting proceedings under Section 10(3) of the Passports Act, 1967, be issued.
5. Section 10 (3) (c) of the Passport Act, 1967 provides, as under-  
**“10(3)(c) if the passport authority deems it necessary so to do in the interests of the sovereignty and integrity of India, the security of India, friendly relations of India with any foreign country, or in the interests of the general public.”**
6. That it is the case of our client that till date our client has not been accused of doing anything which can be said to fall under any of the categories mentioned in Section 10 (3) (c) of the Passports Act, 1967. There is therefore clearly no basis or justification for instituting proposed proceedings under Section 10(3) of the Passports Act, 1967. It is urged that the proposed proceedings under Section 10(3) of the Passports Act, 1967 cannot and, in any event, ought not to, be instituted merely on information from the Directorate of Enforcement that a Complaint under Section 13 of FEMA has been filed against our client


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and a Show Cause Notice has been issued alleging non compliance of Summons issued by the Enforcement Directorate.

7. It is submitted that principles of natural justice and fairness warrant that before an informed decision is taken by you on whether or not to commence proceedings against our client, alleging that Section 10(3) of the Passports Act, 1967 has been contravened, it is essential that the material and information set out below be provided to our client. Our client is entitled to know what the case against him is so that he can suitably respond to your letter under reference.
8. May we therefore, as a matter of urgency, request your good self to furnish/provide us with the following, so as to enable us to file a complete Reply to your letter under reference:-
  - a. All information, material, communications and documents referred to and/or relied upon in the letter under reference;
  - b. Any other relevant material available with you, not referred to and/or relied upon in the letter under reference, including but not limited to the letters dated 5<sup>th</sup> October, 2010 and 15<sup>th</sup> October, 2010;
  - c. Grant of a reasonable time of two weeks, from the date of supply of the information, materials, communications and documents mentioned in para (i) and (ii) above, to submit a Reply.
9. The letter under reference (though delivered on 19/10/2010 and sighted by our client on 20/10/10) prescribes a period of "15 days from the issue of this letter". We would be grateful if you could let us know your decision on our aforesaid request for further information as soon as possible so that we can give a complete Reply. Having regard to the tight time lines prescribed in the letter under reference, we request that, at the very least, you confirm, in writing, by close of office hours on 27/10/2010, what the revised deadline for submitting our client's Reply is. Considering the nature and importance of the proceedings for our client and the contents of the press briefing by none less than the Foreign Secretary, Government of India, it would be in the interest of justice that there be complete clarity in this behalf and there are no surprises. This confirmation can be sent by e-mail and/or fax to us.
10. In the meanwhile our preliminary response to the letter under, is that:-

- a. the letter under reference; the inquiry; and proceedings contemplated, are without jurisdiction;
  - b. Section 10(3) of the Passports Act, 1967 is not attracted;
  - c. the only ground stated in the letter under reference, relates to a Complaint, said to be, under Section 13 of FEMA, alleging non compliance of a summons issued and a Show Cause Notice dated 20th September 2010, issued by the Enforcement Directorate, under FEMA.;
  - d. In this context it is important to point out that the mere non-compliance of a summons, if any, cannot *per se* be a ground for cancellation of Passport;
  - e. No proceedings, under Section 10(3) of the Passports Act, 1967 can or should be instituted and no proposed Show Cause Notice under Section 10(3) of the Passports Act, 1967, should therefore be issued;
  - f. It may also be mentioned that all documents called for by the Enforcement Directorate, which were in our client's possession, have already been supplied.
11. Incidentally, in a Press briefing, the Foreign Secretary, Government of India, while alluding to the subject of our client's Passport, specifically mentioned two communications i.e. letters of 5<sup>th</sup> October, 2010 and 15<sup>th</sup> October, 2010. These letters are not referred to in the letter under reference. We would be grateful if copies of these letters are also made available to us so that a prompt and effective Reply can be made.
  12. It is therefore respectfully submitted that this is not a fit case for institution of any proceedings.
  13. Our client reserves his rights, including but not restricted to, filing a further and detailed reply once the information sought is received.
  14. All further communication in the matter may be addressed to us. We shall submit a Vakalatnama in our favour in the course of the day.

Your truly,  
For Wadia Ghandy & Co

  
Partner

**WADIA GHANDY & Co.**  
**ADVOCATES & SOLICITORS**

Estd. 1883

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O/C

**MOST URGENT**

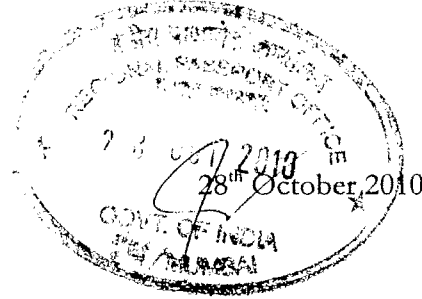
DJM/HC/10082 / 8992/10

The Assistant Passport Officer (Policy)  
Regional Passport Office,  
Mumbai.

Dear Sir,

Reference: (i) Your letter No.F7(5) 10-D-4399/10-572-Pool-1 dated 15/10/2010 ("letter under reference")

(ii) Our letter dated 26<sup>th</sup> October 2010 bearing Ref. No. DJM-HC-10082/8951/10.



We refer to our letter dated 26<sup>th</sup> October 2010 which was delivered at your office yesterday.

In our said letter, we had stated that:-

*"Having regard to the tight timeline prescribed in the letter under reference, we request that, at the very least, you confirm in writing, by close of office hours on 27/10/2010 what the revised deadline for submitting our client's reply is. Considering the nature and importance of these proceedings for our clients and the contents of the press briefing by non less than the Foreign Secretary, Government of India, it would be in the interest of justice that there by complete clarity in this behalf and there are no surprises. This confirmation can be sent by email and/or by fax to us.*

We have till now not received any intimation in this behalf.

Considering the important nature of these proceedings; their sensitive nature; the facts and events set out in our Reply dated 26<sup>th</sup> October 2010, we would once again request that there by no ambiguity whatsoever on (i) the deadline within which you require our client to submit his Reply; and (ii) whether the material requested by our client, will be supplied to him.

**BRANCHES :**

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WADIA GHANDY & Co.

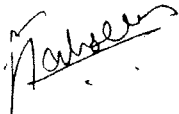
We reiterate that our client does not want any surprises. Fairness and interest of justice demand that this simple request be clearly and urgently responded to.

We, therefore, reiterate this request once again.

Please be good enough to inform us, in writing, by fax and/or email, what the deadline for submitting our client's Reply is. Your letter dated 15<sup>th</sup> October 2010, was delivered on 19<sup>th</sup> October 2010 and sighted by our client on 20<sup>th</sup> October 2010. We have, by our letter dated 26<sup>th</sup> October, 2010, inter-alia, sought an extension.

Please therefore let us have your written response by 12.00 noon today.

Yours sincerely,  
For Wadia Ghandy & Co.

A handwritten signature in black ink, appearing to read 'Nakser', written over a horizontal line.

Partner

o/c

**WADIA GHANDY & Co.**  
**ADVOCATES & SOLICITORS**

Estd. 1883

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\* NOTICE DJM/HC/10082/8997/10

28<sup>th</sup> October 2010

**BY FAX/ E-MAIL/ COURIER**  
**MOST URGENT**

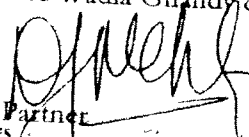
To,  
The Assistant Passport Officer (Policy)  
Regional Passport Office,  
Mumbai.

- Reference: (i) Your letter No.F7(5) 10-D-4399/10-572-Pool-1 dated 15/10/2010 ("letter under reference")  
(ii) Our letter dated 26<sup>th</sup> October 2010 bearing Ref. No. DJM-HC-0082/8951/10.  
(iii) Our Letter dated 28<sup>th</sup> October, 2010 bearing Ref. No. DJM-HC-0082/8994/10

Sir,

1. We refer to our letter dated 28<sup>th</sup> October 2010 which has been sent to your office by email and fax. In our said letter dated 28<sup>th</sup> October, 2010, we had, inter-alia, requested your good self to inform us in writing, by fax and/or email by 12.00 noon today, about the deadline for submitting our client's Reply and that whether the material requested by our client, will be supplied to him.
2. When we did not receive any response, as requested, our Advocate Assistant Mr. Gaurav Gopal telephonically spoke to you at 12:15 p.m. to enquire about the response to our said letter dated 28<sup>th</sup> October, 2010. He was informed by your good self that you had received our letters dated 26<sup>th</sup> October 2010 and 28<sup>th</sup> October 2010 and that these were being examined by the Passport Officer who was processing the same. No response could be given on the phone.
3. We are, in the circumstances, writing to you once again. The matter is extremely urgent. Please therefore let us have your written response by 3.00 p.m. today.

Yours sincerely,  
For Wadia Ghandy & Co.

  
Partner

BRANCHES :  
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DJM/HC/10082 / 9002/10

28<sup>th</sup> October 2010

**BY FAX/ E-MAIL/ COURIER**  
**MOST URGENT**

To,  
The Assistant Passport Officer (Policy)  
Regional Passport Office,  
Mumbai.

- Reference: (i) Your letter No.F7(5) 10-D-4399/10-572-Pool-1 dated 15/10/2010 ("letter under reference")  
(ii) Our letter dated 26<sup>th</sup> October 2010 bearing Ref. No. DJM-HC-0082/8951/10.  
(iii) Our Letter dated 28<sup>th</sup> October, 2010 bearing Ref. No. DJM-HC-0082/8994/10  
(iv) Our letter dated 28<sup>th</sup> October, 2010 bearing Ref. No. DJM-HC-10082/8997/10

Sir,

1. We refer to our letter dated 26<sup>th</sup> October 2010 and two earlier letters of today.
2. We trust that the Passport Officer has by now finished examining our letters and advised you in the matter.
3. Could your goodself, at least now, please let us know , your response to two simple questions which we have been repeatedly asking viz:
  - (i) "What is the deadline fixed by you for submitting our client's Reply?"
  - (ii) "When will the 'material' sought for by us, be supplied."
4. The failure to get a response to this simple request, is now becoming a cause for serious concern and anxiety to our client.
5. Considering the very strange turn of events, our client now seriously apprehends that some ex-parte order may be passed against him.

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**WADIA GHANDY & Co.**

6. We therefore wish to make it clear that our client desires that we appear before you to represent his case in person. Your goodself is therefore requested to inform us when the oral personal hearing is fixed to enable us to appear and make our submissions.

Yours truly,  
For Wadia Ghandy & Co.

*Mahseer*  
Partner

**WADIA GHANDY & Co.**  
**ADVOCATES & SOLICITORS**

Estd. 1883

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*g/c*

DJM/HC/10082 29027/10

29<sup>th</sup> October 2010

**BY FAX/ E-MAIL/ COURIER**  
**MOST URGENT**

To,  
The Assistant Passport Officer (Policy)  
Regional Passport Office,  
Mumbai.

- Reference: (i) Your letter No.F7(5) 10-D-4399/10-572-Pool-1 dated 15/10/2010 ("letter under reference")  
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(iii) Our Letter dated 28<sup>th</sup> October, 2010 bearing Ref. No. DJM-HC-0082/8994/10  
(iv) Our letter dated 28<sup>th</sup> October, 2010 bearing Ref. No. DJM-HC-10082/8997/10  
(v) Our letter dated 28<sup>th</sup> October, 2010 bearing Ref. No. DJM-HC-10082/9002/10

Sir,

1. We refer to our letter dated 26<sup>th</sup> October 2010 and three letters of yesterday i.e. 28<sup>th</sup> October, 2010.
2. Under the said Letters dated 28<sup>th</sup> October, 2010 we had requested you, inter-alia, for informing us about the deadline for submitting our client's reply. Considering the urgency and strange turn of events in this matter, we had also requested your goodself to inform us about the oral personal hearing to be fixed for enabling us to appear, make our submissions and represent the case of our client in person. We have not received response to any of our requests till date.
3. Therefore we are writing to you once again (now for the fifth time) requesting a response to our repeated requests, in writing, by fax or e-mail.

**BRANCHES :**

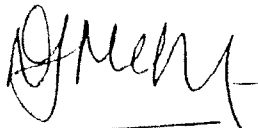
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*A/M*

WADIA GHANDY & CO.

4. The continued stone-walling of a response to our basic requests, repeated over and over again, is now getting bewildering. We are sure the Passport Officer would have by now advised you on how to respond.
5. What is completely baffling is why you do not even specify what the deadline for submitting our client's Reply is. Surely this courtesey and fairness ought to be extended by a person who discharges an important quasi judicial statutory function affecting the fundamental rights and civil liberties of a citizen.
6. Our client is now apprehensive that an ex parte order will be passed against him.
7. May we therefore request that you to let us have your immediate respons as the absence of any response to our requests is now becoming a cause for serious concern and anxiety.

Yours truly,  
For Wadia Ghandy & Co.

  
Partner