

BOBBILI SRINIVAS
PRANAVI SIRIPURAPU
ADVOCATES

Flat No.2-3, Mouli Towers, Behind Krishna
District Lorry Owners' Association Kalyana
Mandapam, near Benz Circle, Vijayawada-16
Contact No:9866043939

REGISTERED POST WITH ACKNOWLEDGMENT DUE

Date: 24.07.2025

To
Sri V.V.Narasimham, Advocate,
Flat No. 301, 8-46-1, Surya Bhavan Apartments,
Vidyanagar Colony, China Waltair Road,
Old CBI Office Road, Visakhapatnam - 530003.
Cell - 7337375015.

Respected Sir,

Sub: Reply to Legal Notices dt.12.07.2025 and dt.13.07.2025 – Reg.

1. Under the instructions and on behalf of my clients (i) Dr.T.Jayarami Reddy, S/o.Venkata Reddy, D.No.6-1-252, Post Office Road, Varadaraja Nagar, Tirupati-517501 & (ii)Smt.Y.Kavitha Reddy, W/o.Y.S.M. Siddhartha Reddy, Age:44 years, R/o.Prestige Silver, Springs Villa No.63 N, Kalaingnar Karunanidhi Salai, Shollinganallur, Chennai-600119, I hereby serve this reply to your notices dt.12.7.2025 and 13.07.2025 issued on the instructions of your client Sri Thotli Neelakanta Reddy, S/o.late Chandrasekhar Reddy.
2. At the outset, my clients categorically deny all the allegations made in your notices, which are false, baseless, devoid of any merit, and contrary to record. These are evidently intended to harass my clients. A point-wise reply is furnished as under:
3. Sri Thotli Venkata Reddy & Smt.Choudamma are the parents of my Client No.1. They had four sons, namely (i) Krishna Reddy, (ii) my client, (iii) Chandrasekhar Reddy (i.e. father of your client) & (iv) Raghunadha Reddy. My Client No.2 is the daughter of my client No.1.
4. After the demise of Thotli Venkata Reddy and his wife, the agricultural land measuring Ac.33.00 cents, situated in various survey numbers of Kotlapalle and Diguwapalem Villages, Thamballapalle Mandal, Chittoor District, which was purchased by Thotli Venkata Reddy, devolved

equally upon their four sons, each receiving Ac.8.25 cents. Since then, my client and his three brothers have been living independently.

5. In the year 1999, Thotli Chandrasekhar Reddy expired, leaving behind his legal heirs: his wife (Vimallamma), two daughters (Neeraja & Neelima), and one son (your client), Neelakanta Reddy.

6. Your client, who is the only male member of his family, instead of taking responsibility for his mother and sisters, borrowed huge amounts, and absconded in 2004. His whereabouts were unknown until 2017. During this period, his mother and sisters, in order to repay the loans incurred by your client, sold the share of the land belonging to Thotli Chandrasekhar Reddy to my Client No.1 & Sri Thotli Kiran Kumar Reddy, S/o.Krishna Reddy, under a registered sale deed in Doc.No.763/2007 dt.26.12.2007, registered at SRO, Thamballapalle.

7. Subsequently, Sri Kiran Kumar Reddy sold Ac.1.00 in Sy.No.196 of Kotlapalle Village out of his undivided half share under the above sale deed dt.26.12.2007 to my Client No.2 vide registered sale deed in Doc.No.1080 of 2022, dt.1.8.2022. Additionally, my Client No.2 became the absolute owner and possessor of another Ac.1.00 in Sy.No.196 of Kotlapalle Village out of the undivided half share under the above sale deed dt.26.12.2007 to my Client No.1 vide registered Partition Deed in Document No.764/2012 dt.07.05.2012. Thus, my Client No.2 has become the absolute owner of the entire land of Ac.2.00 in Sy.No.196 of Kotlapalle Village.

8. Only to repay the loans taken by your client, his mother and two sisters executed the registered sale deed on 26.12.2007. It was for valid consideration, with full knowledge, consent, and free will, without any coercion or misrepresentation. The said transaction has attained finality. Possession was handed over to the purchasers. Revenue Records were mutated accordingly in favour of the purchasers, including my Client No.1, and their successors-in-interest, including my Client No.2.

9. In 2004, when your client disappeared, he was 29 years old. Upon reappearing in 2017 (at the age of 42), he resumed relations with his family and relatives, including my clients. He made no objections to the sale deed executed in 2007, despite being aware of it. His silence for over 8 years, post-return, and 17½ years from the date of execution, amounts to clear acquiescence. In fact, recently, your client purchased a property from my Client No.1.

10. It is even admitted by your client that the land was sold to repay hand loans, and the market value was appropriately reflected in the registered deed. However, with the present increase in land value, your client that too after an inordinate delay of more than 17½ years has taken a complete U-turn with malafide intent to harass and extract money, now falsely claiming that the sale was highhanded and illegal, hence, not binding on him and liable to be cancelled.

11. In this connection, your client is hereby informed that his mother and two elder sisters to repay the loans taken by your client sold the said land under registered sale deed in 2007 as your client disappeared from 2004 to 2017 and they never made an objection for the last more than 17½ years. In fact, your client also, who came to his mother in 2017 and maintaining all relations with his relatives including my clients, did not make any complaint for the last more than eight years. Your client is reminded that he was a major at every relevant point in time, i.e., 24 years old in 1999, 29 years old in 2004, and 42 years old in 2017, and cannot now feign ignorance of the property transactions or claim any coercion against his mother and sisters. His conduct reflects calculated inaction and now opportunistic litigation.

12. The sale deed dt.26.12.2007 is legally valid, duly registered, and has remained unchallenged for nearly 18 years. Your client's belated and baseless allegations are barred by limitation and constitute an abuse of legal process.

13. The records clearly show that the sale was executed voluntarily to discharge debts incurred by your client. Therefore, his current claims are untenable and without any legal or factual foundation.

14. Your client fully aware of the nature and terms of the sale and have accepted the consideration willingly to discharge your then-existing debts and liabilities, as was the primary reason for executing the sale. All records, including the registration documents, clearly reflect this. Now after more than 17 ½ years, your client's baseless allegation that the said sale is not valid, not binding on him and it was executed with force and illegality in a highhanded manner is not only legally untenable but also amounts to abuse of process of law. It is settled law that registered documents cannot be lightly set aside based on vague and unsubstantiated allegations, especially after such an unreasonable delay.

15. It is evident that your notice is intended solely to create unnecessary litigation, waste of judicial time, and pressurize my clients with the objective of reclaiming a valuable property that was lawfully alienated long ago. Such conduct is not only unjustified but also amounts to malicious prosecution and harassment, for which my clients reserve the right to initiate appropriate civil and criminal proceedings against your client, including for damages.

16. Therefore, on instructions of my clients, I call upon your client through you to forthwith withdraw your false and vexatious claims and refrain from initiating any further frivolous legal action. If your client proceeds otherwise, my clients shall be constrained to defend the same at your client's risk, cost, and consequences. This reply is being issued without prejudice to my client's rights and remedies available under law.

Yours Sincerely

Bobbili Srinivas
Advocate

High Courl B.O (500066)

RL RN170439794IN, IVR No:1800280000

29/07/2025 10:59:54. Counter No.2

To: V V NARASTHIA

Andhra Unive, ANDHRA PRAD - 530003

From: B SRINIVAS-500033

Amt: 32.00, CGST:3.00 SGST:3.00

Coll.Amt:38.00, Wt:20 (Actual) gms

P.Mode:Cash,

POD:Yes-Chg: 10

भारतीय डाक

डाक सेवा-जन सेवा

India Post

Dak Sewa-Jan Sewa

