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Advocates

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Reply Notice/Regd.Post Ack Due

Date: 10-06-2025

To
Kiran Kumar B.
Advocate,
"Prerana", Plot No.410,
Road No.22, Jubilee Hills,
Hyderabad-500033.

Sub: Reply Notice issued by you on behalf of your client EKAM
IAS Academy Rep by Sreelekha Abburi, dated.03-06-2025.

Dear Sir,

- 1) My client Mr.Gogulamudi Geetha Vardhan, S/o.Lingachari G., Flat No.301, 3rd Floor, Eternal Sai Krupa Apartments, Srinivasa Nagar Colony, near DD Colony, Bagh Amberpet, Hyderabad-500013 has placed in my hand legal notice dated 03-06-2025 sent by you on behalf of your client EKAM IAS Academy represented by Sreelekha Abburi for its reply and I hereby reply the same as under;
- 2) That without prejudice to the right of my client and anything forgoing, the content of the aforesaid notice are noted and my client hereby deny all the adverse allegations, statements and contentions setout in the aforesaid notice. Specifically those which are contrary to and/or inconsistent with what is stated hereinafter.

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- 3) Notwithstanding anything else, to provide clarity on the subject matter of the notice, we would like to apprise you of the true facts which are detailed in as under.
- 4) It is true that, my client was enrolled as a student at Ekam IAS Academy with enrolment No.1124110025 having joined the UPSC CSE (GST optional) in December, 2023 but not in August, 2024. It is false to state that my client's behaviour and attitude was highly inappropriate particularly with interactions with female students: my client states that you have not mentioned any party's name from whom your client has received complaints.
- 5) It is false to state that my client have morphed videos of faculty member and were involved in spreading false and malicious propaganda against the Academy, its faculty and its operations both within and outside the campus and spoiling peaceful atmosphere of the institution.
- 6) It is false to state that my client misconducted with the faculty and co-students, your client can only call the father of my client to institution only to assault and on egregious violation of my rights. And your client's faculty in front of my father slapped for about 10 times and forced my client to kneel down. The academy's director Shreelekha Abburi along with the management enjoyed the entire process.
- 7) My client submits that he had never spread false defamatory and baseless allegations against the institution. Whatever the other co-students stated about the Academy studies of the institution

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and the same were expressed by my client without defaming the academy under any circumstances.

- 8) It is true that, my client was enrolled as a student at Ekam IAS Academy under enrolment No.1121110025 in December, 2023 having joined the UPSC CSE (GS+Optional) course but not in August, 2024 as stated by you in your legal notice. My client was influenced by major oberoi's interview wherein state that nine months are sufficient to crack UPSC. During admission time the parents of my client and my client were assured that online access to classes would be provided for two years even after the coaching period. My client was also assured that Major oberoi ✓ one of the faculty cum Counsellor Member would teach Ethics, Essay and Internal Security, while Indian polity and PSIR would be taught by Santosh Rao Menneni -
- 9) It is represented by my client that, your client did not stand on the assurance given by your client. There were Academic Concerns and Deficiencies like Indian Polity was left untaught to 30% and PSIR with 50% and History handouts were not provided on time and my clients requested for offline copies and they were refused. When my client questioned the faculty members and no satisfactory answer was received and your client treated that the behaviour and attitude was highly inappropriate and your client created a false story stating that interaction of my client with female students was bad and vulgar. My client also states that at the time of enrolment the management of the Academy assured that there will be limited student in a batch so that each batch

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would have its own peace and learning pattern, but the academy faculty members merged multiple batches making the learning environment uncomfortable and hindering effective learning of the students from the faculty members.

- 10) My client states that prior to joining of Ekam IAS Academy he was student of Byju's offline branch in Narayanguda which was shutdown. As influenced by said Major oboroi's interview and persuaded my client to enrol as student in your client's Academy. And my client's was fixed at Rs.1,15,000/- (Rupees One Lakh Fifteen Thousand Only) for the whole course and out of which my client paid an amount of Rs.90,000/- (Rupees Ninety Thousand Only) and my client took PSIR as his optional subject for UPSC and where your client's faculty by name Mr.Santosh Rao was teaching PSIR and when Mr.Santosh Rao left the institution and my client's optional subject PSIR was left untaught as such, my client was forced to raise the issue of PSIR with the management of Ekam, the management admitted their fault and promised my client and his parents that they were compelled with the promise and the faculty would teach batch-wise and one could join mid-batch and access the course.

Hence a negotiated settlement was reached on 28th April, 2025 at the academy with your client's faculty by name Shashi maam the agreement was;

- (A) Provision or recorded classes of Mr.Santhosh Rao sir from a previous batch.
- (B) As a gesture of goodwill, free full PSIR course (from scratch to the end of Mr.oboroi's PSIR Launching on June 16th 2025) would be provided.

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Then the management demanded balance of Rs.25,000/- fee to be paid by my client. Then my client promised that the Remaining balance of Rs.25,000/- fee will be paid in the upcoming couple of months. The management agreed for same.

Then my client on very next day i.e. on 29th April, 2025 conveyed this negotiation for professional records via an email but they failed to confirm and as my client followed up via call to the front desk, the management stated they would not agree to the two month period for fee clearance. Immediately my client approached Shashi Maam; She demanded post-dated cheque for balance of fees, as my client refused for the same and demanded "No Objection Certificate"; she agreed but threatened my client stating as "you are not agreeing to the proposed solution, I will see how you will stay in the institute and false claimed already 20 girls are ready to complain on you and we can't help you" for that statement my client became panic.

Then my client along with his father approached on the very next day to Shashi Maam for a constructive and amicable resolution but failed and Shashi Maam remained firm) and threatened both my client and his father.

- 11) My client states that a girl by name Mahima from my client's batch, an Anthropology student, herself exchanged contact number with my client on cell phone and she requested to send some important questions, on the above said subject matter, as my client sent the same to the girl through whatsapp, her friend by name Kshitesh became angry with my client and misunderstanding arose between them.

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The management by taking undue advantage of the same and encouraged Miss Mahima to develop immense hate and seek revenge and made her to give a false and untrue events to complain before the management. Later my client was denied entry into the classroom as my client did not clear the remaining balance of fee and also my client's online access was removed and the management immensely pressurized my client and his father to clear rest of fee and my client's father was summoned multiple times seemingly with the intent to cause trouble and defame them in presence of the students and academy members.

- 12) My client states that as exams, time was nearby approaching my client questioned the management's faculty by name Mr.Chaitanya and others for incomplete of syllabus, no satisfactory answer was received by my client. And on the very next day the management faculty by name Mr.Oberoi, Mr.Kranthi and Mr.Chaitanya called my client stating that an FIR had registered against by my client by four girls for teasing, abusing and sexual abuse. As the matter they were no FIR lodged against me, but falsely threatened my client with the said alleged FIR.
- 13) It is represented by my client, on 10th May, 2025 the Ekam IAS Academy's representatives called my client's father and brutally assaulted and insulted and Mr.Vijay Kumar the geography faculty member slapped my client for about 10 times and also forced my client to kneel down. Miss.Shreelekha, Mr.Kranthi, Mr.Vijay and Mr.Srinath and all other faculty members were enjoying the episode. Mr.Vijay Kumar also slapped my client's friend by name Bharat. Even SPS Oberoi infront my client's

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father verbally abused and bad mouthing by abusing my client's mother with SC Caste stating "**LANJA KODUKA etc.**" in abusive language and threatened to kill my client. Mr.Oboroi also stated as "I have done murders in old city and I can kill you, I will kill you". He also referred my client as venomous snake". Immediately after assault Mr.Vijay Kumar forcibly took my client's mobile phone and checked my client's personal whatsapp's messages and all other thing shared my client to his friends or relatives. The Academy's director Miss.Skireelkekha Abburi along with the management was fully aware of these actions and indeed encouraged and enjoyed entire episode. My client's mobile was snatched away by faculty member Mr.Vijay Kumar in the presence of my client's father on my client's several requests, the said mobile phone was returned after 3 days.

- 14) It is represented by my client, later on 5th June, 2025 my client received a personal phone call from an individual at Ekam IAS Academy, threatening that they will file a defamation case against my client and also stating that he was removed from the institute.
- 15) It is represented by my client that, your client has collected fee and not completed the full course and further your client's academy members have caused mental and physical tension to my client by abusing hurling bad language against my client and his parents and also bet as stated above and also expelled from institution in the middle of the course inspite of collecting the fees. Further, your client has ruined my client's academy career and put lot of mental harassment and physical torture so as to cause severe hardship to pursue his further studies.

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Hence my client requests you not to precipitate the matter as the matter is already closed. In spite of this reply notice if your client's proceed further; then my client will defend and also initiate criminal and civil proceedings against your client for criminal breach of trust, humiliation, threaten and causing academic career and pecuniary loss.

Date: 10/6/2025
Hyderabad


(D.Jyothi)
Advocate