

**MANDEEP SINGH VINAIK**  
E.No. D/447/86

**P. B. SINGH**  
E.No. P/385/76

**ANJALI SHARMA**  
E.No. D/691/88

**INTEGRAL**  
**LAW OFFICES**  
LEGAL ADVISORS & ATTORNEYS

**A. B. PANDEY**  
E.No. D/1628/95

**GURPREET SINGH**  
E.No. P/775/03

**DEEPAK BASHTA**  
E.No. D/3091/10

334, Law Chambers, Delhi High Court, New Delhi - 110 003 (India)

375, Sector-15-A, NOIDA-201301 (India)

Telephone : 9810001275, 9810011235, Telefax : 011-23389754

E-mail: operations@integrallawoffices.org, info@integrallawoffices.org, integral.lawoffices@gmail.com

**BY REGISTERED POST AD/BY COURIER/BY E-MAIL**

27<sup>th</sup> February, 2017

Mr. Neeraj Gupta  
Resident of :  
Main Market Bargawa,  
Police Station Bargawa,  
District Singrauli  
Madhya Pradesh

Subject: Cease and Desist notice

Dear Sir,

We are writing to you under instructions from and on behalf of our Client, Wipro Limited, having its registered office at Doddakannelli, Sarjapur Road, Bengaluru, and are instructed to address you as under: --

Our Client is one of the globally recognized Companies in the field of Information Technology and Information Technology enabled services. Our Client is one of the most respected companies and organizations globally and is reputed to be a model Corporate Entity in the corporate world. Our Client is reputed for its caring and nurturing attitude towards its customers and employees.

It has come to the notice of our Client, that you, the addressee named above, has commenced a campaign of calumny and defamation against our Client. You have been widely publicizing, both personally and through various means of communication, such as Email, print media, personal letters in writing, internet and social media, and making bizarre and completely untrue statements to the effect that our Client has somehow, acted to your detriment. Our Client reserves its right under law and equity to spell out the details of your wrongful actions in a subsequent and separate legal action to be initiated against you at risks and costs solely attributable to you.

**INTEGRAL**  
**LAW OFFICES**  
LEGAL ADVISORS & ATTORNEYS

We are stating under instructions that at no point of time, did our Client have any connection with you, in any manner possible. You have never had a relationship of employment or any kind of commercial relationship with our Client. However, despite having no concern with our Client, you have, for reasons best known to you, commenced a slanderous and libelous campaign against our Client.

Perhaps, you are committing such actions with the ulterior motive of extortion and making wrongful gain, and are levelling false, frivolous, slanderous and defamatory allegations against our Client and its employees, in order to make illegal gain by pressurizing our Client and threatening it with defamatory publication.

Besides issuing e-mails, you are also running a libelous campaign against our Client in order to tarnish the good image that this Company holds and in order to cause serious damage to its reputation, thereby leading to tremendous commercial and financial damage. In fact, in your public communications you have gone to the extent of alleging that our Client has cheated you.

Under instructions, we state that upon investigation of your complaints, it has been found that you are merely seeking to blackmail our Client into paying you some compensation, which is not justified given that you have had no connection or engagement with our Client in past. It is reiterated that all your allegations are completely false and baseless and clearly evidence the malafide on your part. By publishing and distributing communications containing such false and baseless allegations, you are defaming our Client and have rendered yourself liable for the consequences of such actions under law and equity.

Besides making defamatory statements about our Client , you are also making false allegations about specific employees of our Client.

The consequences of your defamatory and false campaign can be so severe that, at the moment, it is impossible to make an accurate estimate of the damage that you can inflict by your irresponsible, malicious and mischievous campaign.

Under instructions from, and on behalf of our Client, we are reserving the right to make a pecuniary demand for damages at a subsequent stage.



**INTEGRAL**  
**LAW OFFICES**  
LEGAL ADVISORS & ATTORNEYS

You are therefore called upon to immediately, and forthwith, cease and desist from continuing in your defamatory campaign and writing to our Client and/or its employees, and to issue a letter of apology to our Client. This is also to advise you that if you fail to do as required within a period of 7 days from date of receipt of this notice, our Client would be constrained to initiate legal proceedings including criminal defamation against you at costs and consequences for which you shall be solely liable.

You are therefore, put to notice accordingly. Going forward, all communications addressed to our Client should be sent to the undersigned.

Yours truly,



For **INTEGRAL LAW OFFICES**

2012-13



**RD33323982551N**

**BY REGD. POST**

Mr. Neeraj Gupta  
Main Market Bargawa,  
Police Station Bargawa,  
District Singrauli  
Madhya Pradesh

**INTEGRAL**

**LAW OFFICES**

334, Law Chambers,  
Delhi High Court,  
New Delhi-3 (India)  
Phone : 011-23389754