

To,

Raja Arslan Khan Bhatti

Son of Farhan Ali Nabeel Khan Gujar

R/o Pind Nasrula, Rawalpindi

Subject: **REPLY TO LEGAL NOTICE REFERENCE NO. 20054/21**

DATED 29-10-2021

I have been instructed by my client to serve you with reply of legal notice dated 29-10-2021 sent by you to my client. The para-wise Reply is as under:-

1. Para No. 1 is admitted.
2. Para No. 2 is admitted.
3. Para No. 3 is admitted. The date of payment of remaining sale consideration of Rs. 1,30,00,000/- (Rupees One Croer Thirty Lacs only) and transfer of the house No. DK-254544, Street No. 454, Ratta Amral, Rawalpindi was fixed for 28-10-2021 and in this regard, my client has been contacting your since

28-10-2021 with the request to pay above the remaining sale consideration and to get the house in question transferred in your name but you started delaying the matter and till today you have not made remaining sale consideration of the house in question. My client is still ready to receive the remaining sale consideration and to transfer the house in question.

4. Para No. 4 is admitted to the extent of possession of the house in question. However, as far as the expenses regarding renovation allegedly spent by you are concerned, in reply, it is stated that my client never permitted you to renovate the house in question. So, any expense spent if any, by your on renovation of the said house is not consent of my client.
5. Para No. 5 is incorrect, hence denied. The delay has been caused on your part and not on the part of my client. It is my client, who requested you many times to pay the remaining sale consideration and get the house in question transferred in your name but you always shown lack of interest or unwillingness in this regard. However, my client is still ready transfer the house in question in your name subject to receiving remaining sale consideration detailed above.

6. Para No. 6 is incorrect hence denied vehemently. Detailed has already been given above so same is reiterated here.
7. In reply to para No. 7, it is stated that my client is ready to fulfill his part performance i.e ready to transfer of the house in question in your name after receipt of remaining sale consideration Rs. 1,30,00,000/- (Rupees One Croer Thirty Lacs only)

Therefore, you are hereby directed to withdraw form the above said legal notice dated 29-10-2021 bearing reference No. 20054/21 and to pay remaining sale consideration of Rs. 1,30,00,000/- (Rupees One Croer Thirty Lacs only) and to get the house in question transferred in your name on or before 10-11-2021, failing which my client reserves the right to initiate legal proceedings against you in competent court of law at your own risk and cost

(A copy of instant reply to legal notice is retained in my office for further legal actions)

Yours

Counsel name