



भारतीय प्रतिभूति और विनियम बोर्ड
Securities and Exchange Board of India

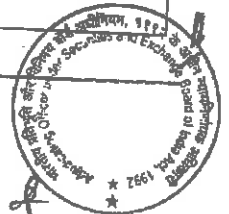
By Speed Post AD/E-mail

GENERAL MANAGER & ADJUDICATING OFFICER
ENQUIRIES AND ADJUDICATION DEPARTMENT-5
Email: AMARN@SEBI.GOV.IN

SEBI/HO/EAD/EAD5/P/OW/2023/50662/19
December 15, 2023

Noticees No./Noticee Name		Addresses
Noticee 1	Sunita Patel Kamlesh (Director – Viyanaa Media Works Pvt Ltd.) PAN: ASQPP4146G Email:skp1232003@gmail.com	1749-15, Gabba Estate, Goharbaug Bllimora Gandevis Navsari Gujarat - 396321
Noticee 2	Nitin Boricha Kishor (Director – Viyanaa Media Works Pvt Ltd.) PAN: AOCPB7290K Email:nitinboricha01@gmail.com	707, Vitthal Rakhumai CHS No.6, Balaram Khedekar Road, Near Wadala Depot, Wadala West, Mumbai – 400031
Noticee 3	Vikaram Vasudev Rajani (Director – Viyanaa Media Works Pvt Ltd.) PAN: AAIPR8153R Email: viki.rajanii@erosintl.com	501-2, Om Shanaaz Apts, Off Versova Link Road, Off Seven Bunglows, Andheri West, Mumbai - 400061 701/702-B, Carnation Apartments, Off. Yari Road, Versova, Andheri West, Mumbai-400061
Noticee 4	Dhrishti Vikram Rajani (Director – Viyanaa Media Works Pvt Ltd.) PAN: CEHPR1820L Email:nextgenfilms@gmail.com	501-2, Om Shanaaz Apts, Off Versova Link Road, Off Seven Bunglows, Andheri West, Mumbai - 400061
Noticee 5	Dev Govind Binani (Director – Spicy Entertainment & Media Ltd) PAN: AIZPB7788F Email:dbinani13@gmail.com	14/1 & 14, Mackenzie Lane, 13 Golabari, West Bengal - 711101
Noticee 6	Abhishek Das (Director – Spicy Entertainment & Media Ltd) PAN: AIUPD2261J Email:abhi_baburam@rediffmail.com/ theabhishekdasofficial@gmail.com/ abhishek.baburam@gmail.com	13A, Bhabanath Sen Street, Kolkata, West Bengal - 700004

सेबी भवन, "जी" ब्लॉक बान्द्रा-कुर्ला कॉम्प्लेक्स, मुंबई - ४०० ०५१
SEBI Bhavan, "G" Block, Bandra Kurla Complex, Mumbai - 400 051
www.sebi.gov.in | 022 - 2644 9000 / 4045 9000





Noticee 7	Anindya Bikas Datta (Director – Spicy Entertainment & Media Ltd) PAN: AJNPD7375B Email: anIndyabikas@gmail.com	Vasundhara Apartment, Flat – 1C, 131 Nazrul Pally, Mahamaya Tala, Garia Kolkata-700084
Noticee 8	Debjit Medda (Director – Upkar Dealtrade Pvt Ltd) PAN: GMDPM8122A Email: debjitmedda@gmail.com	Gopalpur Akuni, Hooghly, West Bengal India-712701
Noticee 9	Rina Kumari Singh (Director – Upkar Dealtrade Pvt Ltd) PAN: BTNPD2312R Email: prlvatecos26@gmail.com	W/O: Rajesh Singh, HI/No. 7, Building No. 5, Bhatpara (M), North 24 Parganas, Kankinara, Kolkata, West Bengal-743126
Noticee 10	Sutapa Mukherjee (Director – Upkar Dealtrade Pvt Ltd) PAN: CFSPM3445J Email: santoshmukherjee1968@gmail.com	Baruipara Kalna, Near Shubh Rakalna, Burdwan, West Bengal - 713409
Noticee 11	Manisha Kumari Singh (Director – Upkar Dealtrade Pvt Ltd) PAN: HDSPS6312B Email: singhmanisha1095@gmail.com	56/4, Rajen Seth Lane, Balur Math, Bally Municipality, Haora, West Bengal, India 711202
Noticee 12	Gourab Ray Chaudhuri (Director – Upkar Dealtrade Pvt Ltd) PAN: AJJPC5551G Email: sahlil.raychaudhuri1985@gmail.com	S/o Goutam Ray Chaudhuri, Village - Kaligram, (P.O) Kaligram, P.S. Chanchal Malda, Malda, West Bengal - 732126
Noticee 13	Vinod Kumar Agarwal (Independent Director – Spicy Entertainment & Media Ltd) PAN: BQIPA6562Q Email: vinodagarwal02051977@gmail.com	64/6, C.S.Mukherjee Street, Konnagar (P), Hugli, Konnagar, West Bengal India-712235
Noticee 14	Sumit Bhoot (Independent Director – Spicy Entertainment & Media Ltd)	17, R N Shah Road, PO Rishra, District - Hooghly, Hooghly, WEST BENGAL-712248



	PAN: BLPPB9770D Email: sumitbhoot22@gmail.com/ sumitforu99@gmail.com	Sumit Bhoot Confident Atik Block H Flat 301 Sarjapur Road Sompura Sompura Near Bengaluru, Karnataka-562126
Noticee 15	Sheetal Suresh Kale (Independent Director – Spicy Entertainment & Media Ltd) PAN: BIOPK9974L Email: tanvik84@yahoo.in/ sheetal.kale@gmail.com	203, Palm Beach Riviera CHSL, Gandhi Gram Road, Near Iskon Temple Juhu, Andheri West, Mumbai-400 049
		A/301 Juhu Gazdar Apartment Juhu Road Juhu Juhu Vile Parle West Mumbai-400049
		Flat No B/1504 Galaxy Heights Link Road Goregaon W Mumbai Near Vasant Galxe Mumbai-400104
Noticee 16	Anil Kumar Sajankumar Sharma (Independent Director – Spicy Entertainment & Media Ltd) PAN: CBWPS6212F Email: anilsharmaca1988@gmail.com/	15, Ghosallya Ka Mohalla, Ward No. 13, Taluka Laxmangarh, Dist Sikar, Rajasthan, India-332311
		B-60 Padmashree Co-Operative Housing Society Ltd, 100 Feet Road, Vasai Road West, Vasai, Palghar, Thane, Maharashtra- 401202
Noticee 17	Debosmita Ghosh Dastidar (Independent Director – Spicy Entertainment & Media Ltd) PAN: ANZPD2124L Email: debosmitatina@gmail.com	Block-3B/1, Kirti Apartment 97, Chandl Ghosh Road, Regent Park, Kolkata, West Bengal, India-700040

Sub.: Show Cause Notice under Rule 4 of the SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 in the matter of Eros International Media Limited.

1. Securities and Exchange Board of India (hereinafter also referred to as 'SEBI') has initiated Adjudication Proceedings under Section 15-I of the SEBI Act, 1992 in respect of Sunita Patel Kamlesh ('Noticee 1'), Nitin Boricha Kishor ('Noticee 2'), Vikaram Vasudev Rajani ('Noticee 3'), Dhristi Vikram Rajani ('Noticee 4'), Dev Govind Binani ('Noticee 5'), Abhishek Das ('Noticee 6'), Anindya Bikas Datta ('Noticee 7'), Debjit Medda ('Noticee 8'), Rina Kumari Singh ('Noticee 9'), Sutapa Mukherjee ('Noticee 10'), Manisha Kumari Singh ('Noticee 11'), Gourab Ray Chaudhuri ('Noticee 12'), Vinod Kumar Agarwal ('Noticee 13'), Sumit Bhoot

Show Cause Notice in the matter of Eros International Media Limited



('Noticee 14'), Sheetal Suresh Kale ('Noticee 15'), Anil Kumar Sajjankumar Sharma ('Noticee 16') and Debosmita Ghosh Dastidar ('Noticee 17') for the alleged violations of Sections 11C(3) and 11C(5) of SEBI Act, 1992, in the matter of Eros International Media Limited ('Eros').

(Hereinafter, Noticee 1 to Noticee 17 are collectively also referred as 'Noticees'/entities', unless the context specifies otherwise)

2. Whereas, the Competent Authority was prima facie of the view that there were sufficient grounds to adjudicate upon the alleged violations by the Noticees, as stated above and therefore, in exercise of the powers conferred under Section 19 of the SEBI Act, 1992 read with Sub-section (1) of Section 15-I of the SEBI Act, 1992 and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995, the Competent Authority appointed the undersigned as Adjudicating Officer ("AO") vide order dated October 17, 2023 to inquire into and under Section 15HB of the SEBI Act, 1992, the alleged violations of the Noticee. The said proceedings of appointment were communicated to the undersigned vide Communique dated October 18, 2023 (A copy of the Communique dated October 18, 2023 is placed as Annexure 1).

3. BACKGROUND

Based on preliminary findings of Investigation by SEBI in respect of Eros International Media Limited, SEBI observed that write-off/provisioning of content advances and trade receivables, prima-facie indicated possible siphoning of funds and manipulation of books of accounts. In this regard, in order to seek additional clarification and also to understand whether movies were actually produced or not, for which the advance was paid by Eros, summons were issued to directors of three Content Advance entities (who were directors during the period when money was advanced by Eros) viz. Nextgen Films Pvt. Ltd. (now known as Viyanaa Media Works Pvt. Ltd.), Spicy Entertainment & Media Ltd. and Upkar Dealtrade Pvt. Ltd., both for personal appearance as well as production of documents.

4. Findings and Observations of SEBI pursuant to Preliminary Investigation and alleged violations:

Pursuant to the preliminary investigation by SEBI, the following was inter-alia observed and alleged in respect of the Noticees viz., Noticee 1 to 17:

4.1. Failed to comply the requirements of SEBI Summons for personal appearance before Investigating Authority ('IA') and failed to submit crucial/complete information as sought in SEBI Summons:

Summons were issued in respect of Noticees 1 to 17 under Section 11C(3) and 11C(5) of the SEBI Act, 1992 inter alia for personal appearance and submission of information sought therein, details of which are given in subsequent paragraphs. However, even after issuance of multiple Summons to the Noticees SEBI observed that the entities did not appear before Investigating Authority (IA) and/or submitted incomplete information to SEBI which had hampered SEBI Investigation and also caused undue delay in the Investigation.

Further, crucial information sought in the Summons such as utilization of funds received from Eros for the production of movies , proof of production of movies such as agreements with star casts, shooting locations, details of shooting etc. was not provided. The same was imperative to proceed further in the matter.

4.1.1. The summons inter alia sought following information from Noticee 1 to Noticee 4 [Directors of NextGen Films Pvt Ltd. (Now known as Viyanaa Media Works Pvt Ltd)]:

1. Following is mentioned in annual report of Eros International Media Limited ("Eros") for FY 2019-20:

"Company enters into agreements with production houses to develop future film content. Advances are given as per terms of agreements. Such content advances are monitored by management of the Company for recoverability and appropriate write offs are taken when film production does not seem viable and refund of advance is not probable basis management evaluation".

2. It is identified that Next Gen Films Pvt Ltd (Now Viyanaa Media Works Pvt. Ltd.). ("Nextgen") was one of such production house with whom Eros had entered into agreement/s. In this regard, you are advised to provide the following:

- Name, address and PAN of shareholders of Nextgen since incorporation till date i.e. as on March 08, 2023.
- Details of direct/indirect association/connection/relation of Nextgen and its directors/owners/proprietor with Eros, its directors and promoters since incorporation till date i.e. till March 08, 2023.
- Details of outstanding amount to Eros (for content advance) in your books of accounts as on March 31, 2013, March 31, 2014, March 31, 2015, March 31, 2016, March 31, 2017, March 31, 2018, March 31, 2019 and March 31, 2020. The same shall be supported by extract of ledgers, agreements for which the advance was received from Eros and copies of Income Tax returns filed by Nextgen.
- Copies of all the agreements entered by Nextgen with Eros since incorporation till date i.e. till March 08, 2023. Also mention details of point of contact in Eros for all the agreements entered since incorporation till date i.e. till March 08, 2023.
- Details of movies co-produced with Eros since incorporation till date i.e. till March 08, 2023 in the following format:

FY	Name of the Movie	Name of the Director	Name of the Artists i.e. lead actor/s, actresses etc.	Date of start of production (If not started, reason for same)	Date of Completion of Production (If not completed, reason for same)	Date of release (If not released, reason for same)	Total Cost for the production-Movie wise

- Details of movies co-produced with other production houses (other than Eros) since incorporation till date i.e. till March 08, 2023 in the following format:

FY	Name of the Movie	Name of the Director	Name of the Artists i.e. lead actor/s, actresses etc.	Date of start of production (If not started, reason for same)	Date of Completion of Production (If not completed, reason for same)	Date of release (If not released, reason for same)	Total Cost for the production-Movie wise

- Details of payments received from Eros to co-produce movies since incorporation till date i.e. till March 08, 2023. The same shall be supported by copies of ledger and copies of bank statements.

- h) Details of payments made in relation to co-production of movies since incorporation till date i.e. till March 08, 2023. The same shall be supported by copies of relevant ledgers and copies of bank statements.
- i) Reason of non-production of movies (as discussed at Para 1 above) which lead to termination of agreement/s by Eros including copies of all the correspondences with Eros in this regard.
- j) Details of all demand notices/correspondences received from Eros w.r.t. Para 1 above.
- k) As per various film co-production term sheets provided by Eros, Nextgen and Eros had entered into following agreements to co-produce various movies.

Sr. No.	Date of Agreement	Value of Agreement (In Cr.)	Name of movie for which agreement was entered
1	11.04.2014	300	Love Aaj Kal – 2, Cocktail – 2, Desi Boyz – 2, Oh My Dog
2	11.08.2016	75	Chandamama Door Ke
3	04.04.2014	50	Untitled - Aditya Dutt
4	01.08.2016	50	Untitled - Rahul Dholakia
5	19.12.2016	50	Untitled - Sanjay Puran
6	02.06.2018	50	Untitled - Anees Bazmee
7	16.01.2017	40	Untitled - Sabbir Khan
8	29.04.2017	40	Aakhon me Toofans
9	18.01.2017	25	Make In India
10	04.04.2013	22	Nikita Pal
11	07.01.2019	20	Untitled - Jyoti Das
12	10.04.2017	15	Phobia 2
13	09.01.2019	15	Untitled - Aditya Dutt
14	07.08.2015	14	7 Kadam
15	05.10.2017	3	Hit

In this regard, you are advised to provide the following:

- Name of the movies which were produced pursuant to aforesaid agreements including names of Star Cast and director/s which were signed for the aforesaid movies.
- Details of shooting happened i.e. shoot locations and details of various legal permissions taken for same.
- Stage at which it was decided to stop further production of movie including reason of same.
- Payment received by Nextgen from Eros against each agreement entered between Eros and Nextgen since the date of agreement till date.
- In terms of the agreements, refund was required to be made to Eros. In this regard, provide details of refund made by Nextgen to Eros.
- Copies of the LFA signed for the films produced under these agreements.

**4.1.2. The summons inter alia sought following information from Noticee 8 to 12
(Directors of Upkar Dealtrade Pvt. Ltd.):**

1. Following is mentioned in annual report of Eros International Media Limited ("Eros") for FY 2019-20:

"Company enters into agreements with production houses to develop future film content. Advances are given as per terms of agreements. Such content advances are monitored by management of the Company for recoverability and appropriate write offs are taken when film production does not seem viable and refund of advance is not probable basis management evaluation".

2. It is identified that Upkar Dealtrade Pvt Ltd ("Upkar") was one of such production house with whom Eros had entered into agreement/s. In this regard, you are advised to provide the following:

- Name, address and PAN of shareholders of Upkar since incorporation till date i.e. as on March 08, 2023.
- Details of direct/indirect association/connection/relation of Upkar and its directors/owners/proprietor with Eros, its directors and promoters since incorporation till date i.e. till March 08, 2023.
- Details of outstanding amount to Eros (for content advance) in your books of accounts as on March 31, 2013, March 31, 2014, March 31, 2015, March 31, 2016, March 31, 2017, March 31, 2018, March 31, 2019 and March 31, 2020. The same shall be supported by extract of ledgers, agreements for which the advance was received from Eros and copies of Income Tax returns filed by Upkar.
- Copies of all the agreements entered by Upkar with Eros since incorporation till date i.e. till March 08, 2023. Also mention details of point of contact in Eros for all the agreements entered since incorporation till date i.e. till March 08, 2023.
- Details of movies co-produced with Eros since incorporation till date i.e. till March 08, 2023 in the following format:

FY	Name of the Movie	Name of the Director	Name of the Artists i.e. lead actor/s, actresses etc.	Date of start of production (if not started, reason for same)	Date of Completion of Production (if not completed, reason for same)	Date of release (if not released, reason for same)	Total Cost for the production-Movie wise

- f) Details of movies co-produced with other production houses (other than Eros) since incorporation till date i.e. till March 08, 2023 in the following format:

FY	Name of the Movie	Name of the Director	Name of the Artists i.e. lead actor/s, actresses etc.	Date of start of production (If not started, reason for same)	Date of Completion of Production (If not completed, reason for same)	Date of release (If not released, reason for same)	Total Cost for the production-Movie wise

- g) Details of payments received from Eros to co-produce movies since incorporation till date i.e. till March 08, 2023. The same shall be supported by copies of ledger and copies of bank statements.
- h) Details of payments made in relation to co-production of movies since incorporation till date i.e. till March 08, 2023. The same shall be supported by copies of relevant ledgers and copies of bank statements.
- i) Reason of non-production of movies (as discussed at Para 1 above) which lead to termination of agreement/s by Eros including copies of all the correspondences with Eros in this regard.
- j) Details of all demand notices/correspondences received from Eros w.r.t. Para 1 above.
- k) As per various film co-production term sheets provided by Eros, Upkar and Eros had entered into following agreements to co-produce various movies.

Sr. No.	Date of Agreement	Value of Agreement (In Cr.)	Name of movie for which agreement was entered
1	20.12.2016	55	Untitled

In this regard, you are advised to provide the following:

- Name of the movies which were produced pursuant to aforesaid agreements including names of Star Cast and director/s which were signed for the aforesaid movies.
- Details of shooting happened i.e. shoot locations and details of various legal permissions taken for same.
- Stage at which it was decided to stop further production of movie including reason of same.
- Payment received by Upkar from Eros against each agreement entered between Eros and Upkar since the date of agreement till date.
- In terms of the agreements, refund was required to be made to Eros. In this regard, provide details of refund made by Upkar to Eros.



VI. Copies of the LFA signed for the films produced under these agreements.

4.1.3. The summons inter alia sought following information from Noticee 5 to 7 and 13 to 17 (Directors of Spicy Entertainment & Media Ltd.):

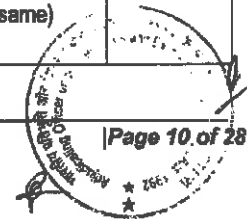
1. Following is mentioned in annual report of Eros International Media Limited ("Eros") for FY 2019-20:

"Company enters into agreements with production houses to develop future film content. Advances are given as per terms of agreements. Such content advances are monitored by management of the Company for recoverability and appropriate write offs are taken when film production does not seem viable and refund of advance is not probable basis management evaluation".

2. It is identified that Spicy Entertainment & Media Ltd ("SEML") was one of such production house with whom Eros had entered into agreement/s. In this regard, you are advised to provide the following:

- Name, address and PAN of shareholders of SEML since incorporation till date i.e. as on March 08, 2023.
- Details of direct/indirect association/connection/relation of SEML and its directors/owners/proprietor with Eros, its directors and promoters since incorporation till date i.e. till March 08, 2023.
- Details of outstanding amount to Eros (for content advance) in your books of accounts as on March 31, 2013, March 31, 2014, March 31, 2015, March 31, 2016, March 31, 2017, March 31, 2018, March 31, 2019 and March 31, 2020. The same shall be supported by extract of ledgers, agreements for which the advance was received from Eros and copies of Income Tax returns filed by SEML.
- Copies of all the agreements entered by SEML with Eros since incorporation till date i.e. till March 08, 2023. Also mention details of point of contact in Eros for all the agreements entered since incorporation till date i.e. till March 08, 2023.
- Details of movies co-produced with Eros since incorporation till date i.e. till March 08, 2023 in the following format:

FY	Name of the Movie	Name of the Director	Name of the Artists i.e. lead actor/s, actresses etc.	Date of start of production (If not started, reason for same)	Date of Completion of Production (If not completed,	Date of release (If not released, reason for same)	Total Cost for the production-Movie wise



					reason for same)		

- f) Details of movies co-produced with other production houses (other than Eros) since incorporation till date i.e. till March 08, 2023 in the following format:

FY	Name of the Movie	Name of the Director	Name of the Artists i.e. lead actor/s, actresses etc.	Date of start of production (If not started, reason for same)	Date of Completion of Production (If not completed, reason for same)	Date of release (If not released, reason for same)	Total Cost for the production-Movie-wise

- g) Details of payments received from Eros to co-produce movies since incorporation till date i.e. till March 08, 2023. The same shall be supported by copies of ledger and copies of bank statements.
- h) Details of payments made in relation to co-production of movies since incorporation till date i.e. till March 08, 2023. The same shall be supported by copies of relevant ledgers and copies of bank statements.
- i) Reason of non-production of movies (as discussed at Para 1 above) which lead to termination of agreement/s by Eros including copies of all the correspondences with Eros in this regard.
- j) Details of all demand notices/correspondences received from Eros w.r.t. Para 1 above.
- k) As per various film co-production term sheets provided by Eros, SEML and Eros had entered into following agreements to co-produce various movies.

Sr. No.	Date of Agreement	Value of Agreement (in Cr.)	Name of movie for which agreement was entered
1	27.06.2016	75	Untitled
2	22.06.2016	65	Untitled

In this regard, you are advised to provide the following:

- Name of the movies which were produced pursuant to aforesaid agreements including names of Star Cast and director/s which were signed for the aforesaid movies.
- Details of shooting happened i.e. shoot locations and details of various legal permissions taken for same.
- Stage at which it was decided to stop further production of movie including reason of same.

- IV. Payment received by SEML from Eros against each agreement entered between Eros and SEML since the date of agreement till date.
- V. In terms of the agreements, refund was required to be made to Eros. In this regard, provide details of refund made by SEML to Eros.
- VI. Copies of the LFA signed for the films produced under these agreements.

Noticee 1: Sunita Patel Kamlesh and Noticee 2: Nitin Boricha Kishor
[Directors of Next Gen Films Pvt Ltd (Now Viyanaa Media Works Pvt. Ltd.)]

As regards Noticee 1, Summon No. 9953/1 dated 08.03.2023 was issued to Noticee 1 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through Speed Post Acknowledgment Due (SPAD). Thereafter, reminder Summon No. 12037/1 dated 23.03.2023 and reminder Summon No.13214/1 dated 31.03.2023 were also sent to Noticee 1 through SPAD. Copy of Summons and reminder Summons along with delivery proofs are placed as **Annexure 1A**. As regards appearance before the IA, SEBI observed that Noticee 1 failed to appear before the IA as required under the Summons issued to Noticee 1.

As regards Noticee 2, Summon No. 9955/1 dated 08.03.2023 was issued to Noticee 2 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through Hand delivery. Thereafter, reminder Summon No.11787/1 dated 21.03.2023 was sent through Hand delivery and reminder Summon No.12569/1 dated 27.03.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 2A**. As regards appearance before the IA, SEBI observed that Noticee 2 failed to appear before the IA as required under the Summons issued to Noticee 2.

As regards production of documents or information as sought in the Summons, vide letter dated March 20, 2023, Noticee 1 and Noticee 2 submitted their common reply to the Summons dated 08.03.2023. Copy of reply is placed as **Annexure 1B**. In this regard SEBI observed that Noticee 1 and 2 failed to submit inter alia the following:

1. Partial submission- extract of ledgers agreements for which the advance was received from Eros and copies of Income Tax returns filed by Nextgen was not provided as sought under point 2.c of para 4.1.1 above.
2. Noticee 1 and 2 provided certain agreements. However, it could not be ascertained that these agreements constituted all agreements as sought under point 2.d of para 4.1.1 above.
3. Noticee 1 and 2 failed to provide any information with respect to queries/information sought at point 2.f, 2.g, 2.h, 2.i, 2.j, 2.k of para 4.1.1 above.

In this regard, SEBI observed that Noticee 1 and 2 failed to submit crucial/complete information as sought in the Summons.

Noticee 3: Vikaram Vasudev Rajani and Noticee 4: Dhrishti Vikram Rajani
[Directors of Next Gen Films Pvt Ltd (Now Viyanaa Media Works Pvt. Ltd.)]

As regards Noticee 3, Summon No. 9951-52/1 dated 08.03.2023 was issued to Noticee 3 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through Hand delivery. Thereafter, reminder Summon No.12035-36/1 dated 23.03.2023 was sent through hand delivery and reminder Summon No.13215-6/1 dated 31.03.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs

are placed as **Annexure 3A**. As regards appearance before the IA, SEBI observed that Noticee 3 failed to appear before the IA as required under the Summons.

As regards Noticee 4, Summon No.9956-7/1 dated 08.03.2023 was issued to Noticee 4 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent to Noticee 4 through Hand delivery. Thereafter, reminder Summon No. 12314/1 and 12317/1 dated 24.03.2023 were sent through Hand delivery and reminder Summon No.13219/1 and 13217/1 dated 31.03.2023 were sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 4A**. As regards appearance before the IA, SEBI observed that Noticee 4 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide their letter dated March 31, 2023, Noticee 3 and Noticee 4 submitted their common reply to reminder Summon No.12035/1 dated 23.03.2023 and reminder Summon No. 12314/1 dated 24.03.2023. Copies of reply is placed as **Annexure 3B**. In this regard SEBI observed that Noticee 3 and 4 failed to submit inter alia the following:

1. Noticee 3 and Noticee 4 failed to provide any information relating to queries/information sought at point 2.b., 2.g, 2.h, 2.i, 2.j, 2.k of para 4.1.1 above.
2. Noticee 3 and Noticee 4 failed to provide any agreement as sought under point 2.d of para 4.1.1 above.
3. Noticee 3 and Noticee 4 failed to provide requisite complete information as sought under point 2.e of para 4.1.1 above.

In this regard, SEBI observed that Noticee 3 and 4 failed to submit crucial/complete information as sought in the Summons.

Noticee 5: Dev Govind Binani (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 5, Summon No. 10063-64/1 dated 09.03.2023 was issued to Noticee 5 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summons No.12033-34/1 dated 23.03.2023 were sent through SPAD and reminder Summons No.13237/1 and 13239/1 dated 31.03.2023 were sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as Annexure 5A. As regards appearance before the IA, SEBI observed that Noticee 5 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide letter dated March 30, 2023, Noticee 5 submitted reply to the Summons dated 23.03.2023. Copy of reply is placed as Annexure 5B. In this regard SEBI observed that Noticee 5 failed to submit crucial/complete information as sought in the Summons viz., inter alia failed to provide any information with respect to queries/information sought at point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

Noticee 6: Abhishek Das (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 6, Summon No. 10094/1 dated 09.03.2023 was issued to Noticee 6 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summon No.12640/1 dated 28.03.2023 was sent through SPAD and reminder Summon No.14526/1 dated 11.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as Annexure

6A. As regards appearance before the IA, SEBI observed that Noticee 6 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide email dated March 27, 2023 and letter dated April 17, 2023, Noticee 6 submitted reply to the Summon dated 09.03.2023. Copies of replies are placed as **Annexure 6B**. In this regard SEBI observed that Noticee 6 failed to submit crucial/complete information as sought in the Summons viz., inter alia failed to provide any information with respect to queries/information sought at Point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

Noticee 7: Anindya Bikas Datta (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 7, Summon No. 10085/1 dated 09.03.2023 was issued to Noticee 7 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summon No.12667/1 dated 28.03.2023 was sent through SPAD and reminder Summon No.14524/1 dated 11.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 7A**. As regards appearance before the IA, SEBI observed that Noticee 7 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide email dated March 27, 2023, Noticee 7 submitted reply to the Summon dated 09.03.2023. Copy of reply is placed as **Annexure 7B**. In this regard SEBI observed that Noticee 7 failed to submit crucial/complete information as sought in the Summons viz., inter alia failed to provide any information with respect to queries/information sought at Point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

Noticee 8: Debjit Medda (Director of Upkar Dealtrade Pvt. Ltd.)

As regards Noticee 8, Summon No. 10125/1 dated 09.03.2023 was issued to Noticee 8 Inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summon No.14699/1 dated 12.04.2023 was sent through SPAD and reminder Summon No.17210/1 dated 27.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 8A**. As regards appearance before the IA, SEBI observed that Noticee 8 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide email dated 04.04.2023, 21.04.2023 and May 08, 2023, Noticee 8 submitted reply to the Summon dated 09.03.2023 and reminder Summons 12.04.2023 and 27.04.2023 respectively. Copies of replies are placed as **Annexure 8B**. In this regard, SEBI observed that Noticee 8 failed to submit inter alia the following:

1. As regards Point 2.d of para 4.1.2 above, Noticee 8 provided one agreement. However, it could not be ascertained that this agreement constitutes to all agreements.
2. Noticee 8 failed to provide any information with respect to queries/information sought at point 2.e, 2.f, 2.g, 2.h, 2.i, 2.j, 2.k of para 4.1.2 above.

In this regard, SEBI observed that Noticee 8 failed to submit crucial/complete information as sought in the Summons.

Noticee 9: Rina Kumari Singh (Director of Upkar Dealtrade Pvt. Ltd.)

As regards Noticee 9, Summon No. 10123/1 dated 09.03.2023 was issued to Noticee 9 inter alia for appearance before the IA and also to produce the

documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, vide email dated April 06, 2023, SEBI provided another opportunity for inter alia personal appearance in view of Noticee 9's email dated April 04, 2023. Further, reminder Summon No.14693/1 dated 12.04.2023 was sent through SPAD and reminder Summon No.17206/1 dated 27.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 9A**. As regards appearance before the IA, SEBI observed that Noticee 9 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide letter dated April 19, 2023, Noticee 9 submitted reply to the Summon dated 09.03.2023. Copy of reply is placed as **Annexure 9B**. In this regard, SEBI observed that Noticee 9 failed to submit inter alia the following:

1. As regards Point 2.d of para 4.1.2 above, Noticee 9 provided one agreement. However, it could not be ascertained that this agreement constitutes to all agreements.
2. Noticee 9 failed to provide any information with respect to queries/information sought at Point 2.e, 2.f, 2.g, 2.h, 2.i, 2.j, 2.k of para 4.1.2 above.

In this regard, SEBI observed that Noticee 9 failed to submit crucial/complete information as sought in the Summons.

Noticee 10: Sutapa Mukherjee (Director of Upkar Dealtrade Pvt. Ltd.)

As regards Noticee 10, Summon No. 10185/1 dated 10.03.2023 was issued to Noticee 10 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summon

No.14684/1 dated 12.04.2023 was sent through SPAD and reminder Summon No.17205/1 dated 27.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 10A**. As regards appearance before the IA, SEBI observed that Noticee 10 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide email dated April 01, 2023, Noticee 10 submitted reply to the Summon dated 10.03.2023. Copy of reply is placed as **Annexure 10B**. In this regard, SEBI observed that Noticee 10 failed to submit inter alia the following:

1. As regards Point 2.d of para 4.1.2 above, Noticee 10 provided one agreement. However, it could not be ascertained that this agreement constitutes to all agreements.
2. Noticee 10 failed to provide any information with respect to queries/information sought at Point 2.e, 2.f, 2.g, 2.h, 2.i, 2.j, 2.k of para 4.1.2 above.

In this regard, SEBI observed that Noticee 10 failed to submit crucial/complete information as sought in the Summons.

Noticee 11: Manisha Kumari Singh (Director of Upkar Dealtrade Pvt. Ltd.)

As regards Noticee 11, Summon No. 10139/1 dated 09.03.2023 was issued to Noticee 11 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summon No.14694/1 dated 12.04.2023 was sent through SPAD and reminder Summon No.17208/1 dated 27.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure**

11A. As regards appearance before the IA, SEBI observed that Noticee 11 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide emails dated 04.04.2023; 19.04.2023 and May 08, 2023, Noticee 11 submitted reply to the Summon dated 09.03.2023 and to reminder Summons dated 12.04.2023 and 27.04.2023 respectively. Copies of replies are placed as **Annexure 11B**. In this regard, SEBI observed that Noticee 11 failed to submit inter alia the following:

1. As regards Point 2.d of para 4.1.2 above, Noticee 11 provided one agreement. However, it could not be ascertained that this agreement constitutes to all agreements.
2. Noticee 11 failed to provide any information with respect to queries/information sought at Point 2.e, 2.f, 2.g, 2.h, 2.i, 2.j, 2.k of para 4.1.2 above.

In this regard, SEBI observed that Noticee 11 failed to submit crucial/complete information as sought in the Summons.

Noticee 12: Gourab Ray Chaudhuri (Director of Upkar Dealtrade Pvt. Ltd.)

As regards Noticee 12, Summon No. 10146/1 dated 10.03.2023 was issued to Noticee 12 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summon No.14696/1 dated 12.04.2023 was sent through SPAD and reminder Summon No.17209/1 dated 27.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 12A**. As regards appearance before the IA, SEBI observed that Noticee 12 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide emails dated 01.04.2023, 22.04.2023 and 06.05.2023, Noticee 12 submitted reply to the Summon dated 10.03.2023 and reminder Summons dated 12.04.2023 and 27.04.2023. Copies of replies are placed as **Annexure 12B**. In this regard SEBI observed that Noticee 12 failed to submit inter alia the following:

1. As regards Point 2.d of para 4.1.2 above, Noticee 12 provided one agreement. However, it could not be ascertained that this agreement constitutes to all agreements.
2. Noticee 12 failed to provide any information with respect to queries/information sought at Point 2.e, 2.f, 2.g, 2.h, 2.i, 2.j, 2.k of para 4.1.2 above.

Noticee 13: Vinod Kumar Agarwal (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 13, Summon No. 10078/1 dated 09.03.2023 was issued to Noticee 13 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. Thereafter, reminder Summon No.13222/1 dated 31.03.2023 was sent through SPAD and reminder Summon No.14554/1 dated 11.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 13A**. As regards appearance before the IA, SEBI observed that Noticee 13 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide email dated March 27, 2023, Noticee 13 submitted reply to the Summon dated 09.03.2023. Copy of reply is placed as **Annexure 13B**. In this regard SEBI observed that Noticee 13 failed to submit crucial/complete information as sought in the Summons viz., inter alia failed to provide any information with

respect to queries/information sought at Point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

Noticee 14: Sumit Bhoot (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 14, Summon No. 10053/1 and 10061/1 dated 09.03.2023 were issued to Noticee 14 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent through SPAD. The same was also sent through email dated March 17, 2023 and March 20, 2023. Thereafter, reminder Summons No.12629-30/1 dated 28.03.2023 were sent through SPAD. Vide email dated April 03, 2023, SEBI provided another opportunity for inter alia personal appearance in view of Noticee 14's email dated April 03, 2023. Further, reminder Summons Nos.14533/1 and 14530/1 dated 11.04.2023 were sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 14A**. As regards appearance before the IA, SEBI observed that Noticee 14 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide emails dated 25.03.2023, 03.04.2023 and 17.04.2023, Noticee 14 submitted reply to the Summon dated 09.03.2023. Copies of replies are placed as **Annexure 14B**. In this regard, SEBI observed that Noticee 14 failed to submit crucial/complete information as sought in the Summons viz., inter alia failed to provide any information with respect to queries/information sought at point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

Noticee 15: Sheetal Suresh Kale (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 15, Summon No. 10073/; 10067/1 and 10074/1 dated 09.03.2023 were issued to Noticee 15 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same were sent through Hand Delivery. The same were also sent through email dated 18.03.2023 and 24.03.2023. In view of failure of Noticee 15 to appear before the IA on the date stated therein, vide email dated 31.03.2023, SEBI granted another opportunity to Noticee 15 inter alia to appear before the IA. Further, in view of Noticee 15's email dated 03.04.2023, SEBI vide email dated 04.04.2023 granted another opportunity to appear before the IA. Thereafter, reminder Summon No. 14557/1 dated 11.04.2023 was sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 15A**. As regards appearance before the IA, SEBI observed that Noticee 15 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide emails dated 29.03.2023, 03.04.2023, Noticee 15 submitted reply to the Summon dated 09.03.2023. Copies of replies are placed as **Annexure 15B**. In this regard SEBI observed that Noticee 15 failed to submit crucial/complete information as sought in the Summons viz., inter alia failed to provide any information with respect to queries/information sought at point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

Noticee 16: Anil Kumar Sajjankumar Sharma (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 16, Summon No. 10103/1 and Summon No. 10108/1 dated 09.03.2023 were issued to Noticee 16 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summons. The same were sent through SPAD. Thereafter, vide email dated 14.03.2023, SEBI sent reminder regarding the aforesaid summons. Vide email dated 14.03.2023 and 17.03.2023, Noticee 16 informed SEBI that he was not a member of the Board of the Company and

asked SEBI to connect with current directors. Vide email dated 27.03.2023, Noticee 17 provided certain information, however, failed to appear before the IA. SEBI issued reminder Summon No. 12652/1 dated 28.03.2023 sent through SPAD inter alia providing another opportunity to appear before the IA. Noticee 17 again failed to appear before the IA and reminder summon No. 14455 and 14458/1 dated 11.04.2023 was issued inter alia providing last opportunity to appear before the IA, which were sent through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as **Annexure 16A**. As regards appearance before the IA, SEBI observed that Noticee 16 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide emails dated 14.03.2023; 17.03.2023 and 27.03.2023, Noticee 16 submitted reply to Summon dated 09.03.2023. Copies of replies are placed as **Annexure 16B**. In this regard, SEBI observed that Noticee 16 failed to submit crucial/complete information as sought in the Summons viz., Inter alia failed to provide any information with respect to query/information sought at point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

Noticee 17: Debosmita Ghosh Dastidar (Director of Spicy Entertainment & Media Ltd.)

As regards Noticee 17, Summon No. 10113/1 dated 09.03.2023 was issued to Noticee 17 inter alia for appearance before the IA and also to produce the documents or information before the IA, as sought in the Annexure to the Summon. The same was sent to Noticee 17 through SPAD. Thereafter, reminder summon No. 12663/1 dated 28.03.2023 was sent through SPAD. Noticee 17 submitted reply dated 31.03.2023 and 04.04.2023 inter alia indicating inability to appear before the IA outside Kolkata due to medical issues going on at her place. Thereafter, vide email dated 06.04.2023, SEBI advised Noticee 17 to appear before the IA personally on April 10, 2023 at

SEBI Eastern Regional Office. Noticee 17 failed to appear before the IA, in this regard, reminder letter No. 14471/1 dated 11.04.2023 was sent to Noticee 17 through SPAD. Copies of Summons and reminder Summons along with delivery proofs are placed as Annexure 17A. As regards appearance before the IA, SEBI observed that Noticee 17 failed to appear before the IA as required under the Summons.

As regards production of documents or information as sought in the Summons, vide email dated March 31, 2023 and 04.04.2023, Noticee 17 submitted reply to the Summons dated 09.03.2023. Copies of replies are placed as Annexure 17B. In this regard, SEBI observed that Noticee 17 failed to submit crucial/complete information as sought in the Summons viz., inter alia failed to provide any information with respect to query/information sought at Point 2.e, 2.h, 2.i, 2.j, 2.k of para 4.1.3 above.

In view thereof, Noticees 1 to 17 are alleged to have violated provisions of Section 11C (3) and 11 C (5) of SEBI Act, 1992.

5. The text of relevant provisions which are alleged to have been violated are reproduced below :

“...
Investigation.
11C. (1) ...

(3) The Investigating Authority may require any intermediary or any person associated with securities market in any manner to furnish such information to, or produce such books, or registers, or other documents, or record before him or any person authorised by it in this behalf as it may consider necessary if the furnishing of such information or the production of such books, or registers, or other documents, or record is relevant or necessary for the purposes of its investigation.

(5) Any person, directed to make an investigation under sub-section (1), may examine on oath, any manager, managing director, officer and other employee of any intermediary or any person associated with securities market in any manner, in relation to the affairs of his business and may administer an oath accordingly and for that purpose may require any of those persons to appear before it personally.

...
Note: for detailed/ complete text of the provisions, relevant Acts/Regulations/Circulars etc., may please be referred.



6. The aforesaid alleged violations, if established, make each of the Noticees 1 to 17 liable for monetary penalty under Section 15HB of SEBI Act, 1992 which reads as follows:

... *Penalty for contravention where no separate penalty has been provided.*

15HB. Whoever fails to comply with any provision of this Act, the rules or the regulations made or directions issued by the Board thereunder for which no separate penalty has been provided, shall be liable to a penalty which shall not be less than one lakh rupees but which may extend to one crore rupees.

...

Note: for detailed/ complete text of the provisions, relevant Acts etc., may please be referred.

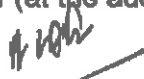
7. Noticees 1 to 17 are hereby called upon to show cause as to why an inquiry should not be held against you in terms of Rule 4(1) of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 read with Section 15-I of the SEBI Act, 1992 and, why penalty be not imposed under Section 15HB of SEBI Act, 1992 for the aforesaid alleged violations.
8. Noticees 1 to 17's reply to the SCN, if any, along with the relevant supporting documents, should reach the undersigned at the address mentioned below, as well as through email at AMARN@SEBI.GOV.IN and POOJAR@SEBI.GOV.IN (both in .pdf and MS-word format) within 14 days from the date of receipt of this notice, failing which it shall be presumed that Noticees 1 to 17 respectively have no reply to submit and the matter would be further proceeded with on the basis of material / facts available on record.

Address for reply/correspondence:	Enquiries and Adjudication Department – EAD-5 Securities and Exchange Board of India SEBI Bhavan - II, Plot no. C-7, Block 'G', Bandra Kurla Complex, Bandra (East) Mumbai – 400 051
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9. Noticees 1 to 17 may also indicate whether personal hearing in the matter is desirable.
10. Noticees 1 to 17 are advised to keep the undersigned informed about current details, should the same be different from as stated on page 1 (viz. name in full,

all correspondence addresses in complete, all email id's, all contact telephone numbers) and also keep the undersigned promptly informed about any change in correspondence address and /or email id's and /or contact telephone numbers, till the conclusion of the proceedings. Further, Noticees 1 to 17 are also advised to submit duly attested clear readable photocopy of your identification documents including copy of PAN card, addresses and contact details viz. Telephone numbers / Fax numbers / e-mail IDs etc., for records.

11. Noticees 1 to 17 may also note that a settlement mechanism is provided under the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018. If Noticee(s) wish to opt for the settlement process, the same may be applied for, in the manner given in the regulations, under prompt intimation to the undersigned.
12. Noticees 1 to 17 are advised to acknowledge receipt of this Notice on prompt basis by way of email (AMARN@SEBI.GOV.IN and POOJAR@SEBI.GOV.IN) and/or letter (at the address given under Para 8 above).


AMAR NAVLANI
ADJUDICATING OFFICER



List of Enclosures:

S. No.	Annexure No.	Particulars/Details
1	Annexure 1	Copy of Communique dated October 18, 2023.
2	Annexure 1A and 1B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 1 and Copy of common reply of Noticee 1 and Noticee 2 respectively.
3	Annexure 2A	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 2.
4	Annexure 3A and 3B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 3 and Copy of common reply of Noticee 3 and Noticee 4 respectively.
5	Annexure 4A	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 4.
6	Annexure 5A and 5B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 5 and Copies of replies of Noticee 5.
7	Annexure 6A and 6B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 6 and Copies of replies of Noticee 6.
8	Annexure 7A and 7B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 7 and Copy of reply of Noticee 7.



9	Annexure 8A and 8B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 8 and Copies of replies of Noticee 8.
10	Annexure 9A and 9B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 9 and Copy of reply of Noticee 9.
11	Annexure 10A and 10B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 10 and Copy of reply of Noticee 10.
12	Annexure 11A and 11B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 11 and Copies of replies of Noticee 11.
13	Annexure 12A and 12B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 12 and Copies of replies of Noticee 12.
14	Annexure 13A and 13B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 13 and Copy of reply of Noticee 13.
15	Annexure 14A and 14B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 14 and Copies of replies of Noticee 14.
16	Annexure 15A and 15B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 15 and Copies of replies of Noticee 15.
17	Annexure 16A and 16B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 16 and Copies of replies of Noticee 16.
18	Annexure 17A and 17B	Copies of Summons, reminder Summons along with Delivery proofs issued to Noticee 17 and Copies of replies of Noticee 17.

