

From: **Jyothi Suresh Kumar** <Jyothi.Sureshkumar@timesgroup.com>

Date: Thu, Apr 30, 2020, 12:19 AM

Subject: RE: Complaint against Times Now channel's telecast of defamatory content and for running a smear campaign on Teesta Setalvad

To: Citizens for Justice and Peace Mumbai <cjpindia@gmail.com>

Cc: legalnow <legalnow@timesgroup.com>, Vineet Jain <Vineet.Jain@timesgroup.com>

WITHOUT PREJUDICE

Dear Sir/Madam,

This is in response to your email complaint below.

At the outset, the allegations levelled against us in your complaint are false, frivolous and vexatious, and are hereby rejected outright. We also challenge the locus of the Centre for Justice and Peace in the present complaint as the news articles mentioned in the complaint have no reference to your organization or Ms. Setalvad's role therein.

We deny each of the allegations made out against our channel and its representatives. The news articles in question can by no means be termed maligning, derogatory or defying the ethics and fundamental principles of journalism in India or a 'smear campaign' as alleged. The news articles published on 09.03.2020 and 19.02.2020, were bonafide and carried in public interest.

The news article published on 09.03.2020 had put out the factual situation on Ms. Setalvad's views on National Population Register (NPR). The news article clearly states that Ms. Setalvad was not against Census but was strong in her stand that Census should not begin or be undertaken unless NPR is withdrawn, thereby showing that Ms. Setalvad was not in favour of the Census until and unless NPR was withdrawn. As regards your objection to the term 'Modi Baiter', appearing in the said news article, you must be well aware, that this term, is far from being derogatory. The simple layman meaning of the word 'baiter' is someone who teases or as Cambridge Dictionary says, 'a person who intentionally makes someone angry by saying or doing things to annoy them'. In fact it has been used several times, in print and electronic media, while referring to Ms. Setalvad. With specific reference to the news reports in question it merely indicated that Ms. Setalvad held a specific opinion about certain policy issues of Mr. Modi, based on her stand on those issues in the past. The use of the term therefore was nowhere defamatory or derogatory and it appears that you have chosen to adopt a very narrow meaning while interpreting the same.

The news article carried on 19.02.2020 was in relation to Ms. Setalvad's visit to Shaheen Bagh and the allegations that she 'tutored' the protestors. The news article showed beyond reasonable doubt that Ms. Setalvad was in fact present at Shaheen Bagh and the video that was available on public platform showed Ms. Setalvad not just visiting but undoubtedly 'coaching' the protestors. Again the terms 'tutored' or 'coached' as used in the news article was merely to describe Ms. Setalvad's conduct at Shaheen Bagh. Her comments '*sawaal theek hain na?*' and '*sawaal rakhna farz hain hamaara*' makes this amply clear.

We deny your allegations that Mr. Rahul Shivshankar referred to the apex court appointed interlocutors as 'Modi Haters'. There is no such comment made by Mr. Shivshankar as part of the said news articles.

The allegations of running a smear campaign and defaming the image of Ms. Setalvad are therefore baseless and lack merit. We reiterate that the news articles were published without any malafide intention whatsoever and did not in any manner defame or bring disrepute to Ms. Setalvad as alleged in the email under reply. As a responsible media platform, the news articles focused on issues of critical public importance, and constitutes fair reporting in good faith and for public good.

We deny all of the allegations made out in the complaint against the channel and its representatives. The same was carried in public interest and thus there is no prejudice caused to anyone much less Ms. Setalvad under any circumstances whatsoever.

In light of the above clarifications, we request you to withdraw the said complaint immediately.

We expressly reserve our rights to make further representations and submissions in support of our position, as maybe required, at any time in the future. This reply is being issued without prejudice to our rights and contentions and nothing contained in this reply shall be deemed an admission of any fact or a waiver of any of rights or remedies in connection with the subject matter of the complaint, whether at law or in equity, all of which rights and remedies are hereby expressly reserved.

Yours sincerely
Jyothi Suresh Kumar
Authorized Legal Representative
Bennett, Coleman & Company Limited (Times Network)