

# ABDUL KARIM KHAN & COMPANY

(Advocates, Barristers, Attorneys and Legal Consultants)  
Suite No: 1108, Kashif Centre, Main Sharah-e-Faisal, Karachi.  
Cell: 0322-2888374, 0322-2999360  
Email: [imdadaliadv@gmail.com](mailto:imdadaliadv@gmail.com), [akkcadvocates@gmail.com](mailto:akkcadvocates@gmail.com)

---

May 18, 2015

WITHOUT PREJUDICE

VIA EMAIL: [REDACTED]

Pak Tea House  
Through its chief editor  
[REDACTED]

**Re: LEGAL NOTICE FOR DEFAMATION & DAMAGES UP TO PKR 500 MILLION**

Addressee,

Under instructions and at the behest of our client M/s Axact Private Limited (hereinafter referred to as our "client"), we have to write to you and address you as under:

1. That, through the circulation of defamatory content/article originally published by International New York Times titled "Fake Diplomas, Real Cash: Pakistani Company Axact Reaps Millions" ("**Impugned Article**"), you, the Addressee, have further imputed our client's reputation and have circulated and republished false, fictitious and defamatory allegations against our client, whereby a man of prudent and reasonable thought may have drawn judgment against the character /repute/ dispositions of our client in a manner that offends the very fabric and principles upon which our client bases its upright values and standards. The URL's circulating the defamatory content are reproduced herein below:

<http://pakteahouse.net/2015/05/18/break-the-internet-report-on-axact-by-nyt/>

2. That, it is clarified that the original source of the Impugned Article i.e. the International New York Times has been put under notice of defamation in all the concerned jurisdictions wherever our client's reputation has been affected and is facing serious legal repercussions for publishing and originating very serious nature of defamatory and libelous allegations against our client. Your act of circulating the same defamatory content, amounts to libel for republication of the defamatory content.

3. That, our client has vehemently denied all the allegations raised in the impugned article for being false and fictitious. Whereas, the detailed official response released by our client can be seen at <http://xwebsrvdenew:705/defamation-response/> - the official response of our client is sufficiently substantiated with required evidence and removes all the doubts created by the defamatory article. Contrary to the allegations, our client provides a comprehensive education management system that benefits diverse bodies of students and caters to all types of educational institutions—online and traditional. It is a 360 degree solution for students and faculty around the globe, available on multiple educational platforms being its core capability. Furthermore, Our Client's Online Education Management System is World's Leader outside North America and our client is now collaborating with other renowned education groups in the USA to provide its Education Management System and is poised to be a major player in the online education industry of USA by 2018.
4. That at the very outset the premise and content of the circulated defamatory article is categorically denied and you are called upon to substantiate your malicious allegations through cogent and legally sound and recognizable proof, documentary and / or otherwise.
5. That it is pertinent to bring into your notice that our client has recently ventured in the media industry of Pakistan under the name of "BOL" by announcing a complete media enterprise. Since, its adventure in the media industry, few competitor media houses has started an illegal, unwarranted and unfounded criticism at our client with the intention to primarily misguide the media professionals and keep them away from joining this new channel. In pursuance thereof, many defamatory articles were published from time to time and our client has seriously pursued all the matters through the courts of law. In result thereof, few media houses are restrained through courts restraining orders from publishing any defamatory item against our client which may be detrimental to its repute.
6. That, in an exemplary display of poor journalistic skills and yellow journalism, the author of the impugned article quoted references from several imaginary employees to corroborate accusations made out of thin air. None of these accusations have been substantiated with any real proof. Search engines have been used to type 'fake degrees' and whatever images have turned up have been portrayed as evidence. Additionally, no proof has been given linking any of these sites and allegations to our client and widely recognized names such as that of John Kerry have been used to increase the impact of the story. In fact the writer himself admits that when he approached these universities, they denied having any links with our client. Furthermore, in a glaring display of bias, he didn't even mention the fact that all these previous published allegations have been more than adequately addressed by our client earlier in the civil suit 907/2013 filed against GEO and others. One aspect that stands very clear from all this is that a personal grudge has been displayed by the writer. Parallels laded with negativity have been drawn with the portrayal of positive Pakistan and also including references to the Silicon Valley as if offering

- world-class facilities to employees is something that we should be ashamed about when it is our pride.
7. As a result of the circulation, our client and his reputation have been severely damaged by the circulation of your harmful and damaging statements. No monetary compensation can repair the wrong caused upon our client by your unlawful acts, however, the estimated loss occurred till now has reached PKR 500 Million and is growing every minute.
  8. The contents of the instant Notice are without prejudice to our client's rights and / or privileges guaranteed to them under the law.
  9. **You are, therefore, called upon through the instant Notice to immediately take down the links within 24 hours from receipt of this Notice and extend an unconditional apology and retraction, for your illegal, defamatory, slanderous and malicious actions, through the same medium.**

Hereon on receipt of this Notice, you are advised to act in accordance herewith within 24 hours failing which we have definitive instruction to initiate Civil as well as criminal proceedings against you in U.K, U.A.E, U.S and all/any jurisdictions applying in the circumstances of the case.

We look forward to hearing from you as a matter of urgency.

A handwritten signature in blue ink, appearing to read 'Abdul Karim Khan', with a long, sweeping underline.

ABDUL KARIM KHAN & CO  
Advocates & Barristers

cc:  
- The Client