



Philip Augustine &lt;philipaugustineassociates@gmail.com&gt;

## Fw: Reply on behalf of Elsevier BV

sreekumar sreedharakurup &lt;advssreekumar@yahoo.com&gt;

Fri, Jun 12, 2020 at 11:39 AM

To: Philip Augustine &lt;drphilipaugustine@yahoo.co.in&gt;, Philip Augustine &lt;philipaugustineassociates@gmail.com&gt;

Sir,

please find reply notice received from Elsevier B.V.

Regards,

For M/S.S.SREEKUMAR ASSOCIATES  
Advocates

----- Forwarded message -----

**From:** Priyanka Khimani <priyanka@anandanandkhimani.com>**To:** advssreekumar@yahoo.com <advssreekumar@yahoo.com>; advssreekumar201@gmail.com <advssreekumar201@gmail.com>**Cc:** Chaitrika Patki <chaitrika@anandanandkhimani.com>; Ruhani Sanghavi <ruhani@anandanandkhimani.com>**Sent:** Thursday, 11 June, 2020, 04:57:46 pm IST**Subject:** Reply on behalf of Elsevier BV**Kind attn: Mr. Thomas Kuruvilla**

Sir,

We are concerned for our client, Elsevier BV ("our client"), who has placed in our hands your Notice dated 1<sup>st</sup> June, 2020 ("Notice").

Please find attached an interim response to the said Notice on behalf of our client, dated 8<sup>th</sup> June, 2020, as and by way of service upon you, the contents of which are self-explanatory.

As your firm's email address was unavailable in the Notice, we had relied on the online record for your email address in order to serve the interim response. We inadvertently served the said interim response on 8<sup>th</sup> June, 2020 on an email address registered to different firm with an identical name as yours, as per the records available online. We have been able to confirm your correct contact details today and are accordingly serving the interim response on behalf of our client through the present email.

Please address all further communication, including any reply to the aforesaid, to the undersigned.

Yours faithfully,

Priyanka Khimani, Partner

Anand &amp; Anand &amp; Khimani

(Advocates for Elsevier BV)

anand&anand  
khimani

priyanka khimani / priyanka@anandanandkhimani.com  
+919820468822 +91 22 22048821 / 703-704  
free press contact number 400 021

Reply to your notice on behalf of Elsevier BV-AAK-08062020.pdf  
275K

AAK/120/027

8<sup>th</sup> June, 2020

**BY EMAIL**

To,  
**M/s. Sreekumar Associates,**  
**Advocates for Dr. Philip Augustine and Dr. Cyriac Abby Philips,**  
Door No. 67/1433,  
Chitoor Road, Near North Police Station,  
Cochin – 662 016

**Sub: Your Notice dated 1<sup>st</sup> June, 2020 addressed to Elsevier BV**

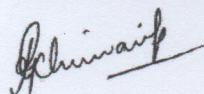
Sir/Madam,

1. We are concerned for our client, Elsevier BV, (“**our client**”), who has placed in our hands your Notice dated 1<sup>st</sup> June, 2020.
2. We are currently in the process of perusing the contents of the said Notice as well as seeking necessary instructions from our client in relation thereto. Accordingly, we reserve our right to file an appropriate response to the said Notice upon receipt of the said instructions from our client. We trust that in view of our immediate response to the said Notice, you will refrain from initiating any proceedings against our client.
3. Please note that in the event that you do adopt any proceedings against our client, our client will defend the same entirely at your risk, as to the costs and consequences thereof.
4. Please also note that this response should not be taken to constitute any admission or acknowledgement of the allegations or contentions contained in the said Notice. So also, nothing contained in this response should be construed as a waiver of any rights or remedies available to our client, all of which our client expressly reserves.
5. All inquiries, communications and correspondence for any purpose in relation to the above, including any response to the above, may be directed to the undersigned at the address and contact details provided herein:

**M/s. Anand & Anand & Khimani**  
703-704, Tulsiani Chambers,  
Nariman Point, Mumbai – 400 021  
Tel: +91 22 2204 8821

Email: [priyanka@anandanandkhimani.com](mailto:priyanka@anandanandkhimani.com)

Yours faithfully,  
Priyanka Khimani, Partner



Anand & Anand & Khimani  
(Advocates for Elsevier BV)