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Advocates & Legal Consultants

THROUGH COURIER SERVICE

Dated:30.01.2023

To,

Mr Imran Ahmed Khan Niazi
Chairman Pakistan Tehreek-e-Insaaf
Khan House, Bani Gala,
Mohra Noor, Islamabad.

SUBJECT: LEGAL NOTICE

We act on behalf of our client Mr. Asif Ali Zardari (hereinafter, referred to as 'our client') and upon whose instructions we address you as follows:

1. That our client is the President of Pakistan Peoples Party Parliamentarian, one of the largest political party in Pakistan and former President of the Islamic Republic of Pakistan. Our client belongs to a prominent political family of Pakistan. He is husband of former Prime Minister of Pakistan, Shaheed Mohtarma Benazir Bhutto who was first woman Prime Minister of Muslim World and former Chairperson of Pakistan Peoples Party. Our client has remained Member of National Assembly and Senate.
2. That on 27.01.2023, you in your Video link address, which was broadcasted on almost all news channels all over the world including England and reported in all newspapers globally as well as in Pakistan including Karachi, made false, fabricated and scandalous remarks/statements as well as levelled baseless allegations of serious nature against our client. You in your Video link address stated that "Asif Zardari has paid his corruption money to a terrorist

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organisation being supported by powerful state agency facilitators to launch another attack on me.” Moreover you also included our client in four people who are allegedly plotting to assassinate you. Your aforesaid statements are being highly reported on print and social media and the same are also being broadcasted globally including in England.

(Copy of News Report published in Dawn dated 28.01.2023 is attached as Annex “A”)

3. That through your baseless accusations of malicious and defamatory nature you have tried to defame our client nationally as well as internationally. Moreover through your defamatory, libelous, scandalous remarks and allegations of serious nature you have tried to create a link between our client and terrorist organisations blindly disregarding the fact that our client and his party has remained the victim of terrorism. Moreover, wife of our client and former Prime Minister of Pakistan Shaheed Mohtarma Benazir Bhutto was also assassinated by terrorists.

4. Furthermore in your statements you have stated that our client, through corruption money, is hatching a fresh plan to allegedly assassinate you despite the fact that our client has languished in prison for almost eight years in false, fabricated, trumped up and concocted cases including corruption cases and not one of which was proved against him and he was acquitted in all those cases honorably.

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5. Your libelous, scandalous and defamatory statements against our client, which are being widely circulated on social as well as mainstream media globally, were made by you with malafide intentions and ulterior motives to injure, harm, defame and disparage the reputation and name of our client who has made struggle and sacrifices for the restoration of democracy in Pakistan.
6. That our client has remained on the highest constitutional posts of Pakistan and has made numerous struggles for the betterment of Pakistan which is evident from the fact that he has been called as the founder of the China-Pakistan Economic Corridor as he initiated this great project which will be beneficial not only for Pakistan but for the whole region. Hence your baseless allegations against our client have also harmed the global reputation of Pakistan.
7. That our client believes that your serious allegations of paying terrorists and plotting your assassination are false, libelous, scandalous and without any proof and are vehemently denied. Hence the same have been made with malafide intentions in order to defame our client for ulterior motives and other reasons best known to you to explain in this regard.
8. That the statements made by you have also caused great harm and hurt to the sentiments of the members of Pakistan Peoples Party which are not only in Pakistan but all over the world thereby damaging and defaming their reputation.

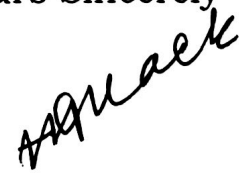
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9. That your above said actions have maligned, smeared and dishonored our client's name and reputation within the country as well as abroad as the same is an attack on his personal life as well as on his political career. You through your malicious accusations have injured and defamed our client with ulterior motives to get undue benefit in current political situation of the country.
10. That through your above said defamatory actions against our client, you have committed utterly unjustified and inexcusable defamation just to malign our client's reputation in Pakistan as well as in the world causing severe agony, mental stress and loss of reputation.

You are, therefore, hereby called upon to render unconditional apology from our client, on television, print and social media, within 14 (fourteen) days from the receipt of this notice, failing whereof, our client shall be constrained to institute appropriate legal proceedings against you, civil as well as criminal, before the competent Courts of law and forums of Pakistan as well as of England, including but not limited to Suit for Damages for Rs.10,000,000,000/- (Rupees ten billion Only) at your risk as to cost and consequences.

Yours Sincerely



(FAROOQ H. NAEK)

SENIOR ADVOCATE SUPREME COURT

'Plan C' to kill me hatched by Asif Zardari, Imran alleges

• PTI chief claims PPP leader 'paid terrorists being supported by state agency facilitators with corruption proceeds'

• Urges judiciary to act to protect democracy, fundamental rights

2-8-1-2023

By Mansoor Malik

LAHORE: In a startling allegation, Pakistan Tehreek-i-Insaf (PTI) Chairman Imran Khan has now accused former president Asif Ali Zardari of being part of a plan to 'get rid of him', alleging that after "two" failed attempts on his life, the four people—who he has previously claimed to have hatched a conspiracy to kill him—along with the PPP leader, have now prepared a "Plan C" to eliminate him.

A couple of times last year, Mr Khan had alleged that four individuals had plotted to assassi-

Security withdrawn from Imran's Banigala residence: Page 4

nate him and said he had recorded a video identifying those people that was stored abroad and would be released if the plan succeeded. The first plan, he claims, was never executed after he exposed it, while the second attempt occurred in Wazirabad.

"Asif Zardari has paid his corruption money to a terrorist organisation being supported by powerful state agency facilitators to launch another attack on me," Mr Khan alleged in a televised address from his Zaman Park residence on Friday.

He further said he was now disclosing to the nation the nefarious design of the four peo-

ple allegedly being aided by Mr Zardari. "If I am attacked, people should know about the assailants," he stated.

Recalling that he had exposed the earlier two assassination plans in his public meetings, the former prime minister said the incumbent rulers installed through a "regime change conspiracy" were pushing the country towards disaster. He also said he continued appealing to the powers-that-be that they had committed a mistake that could be rectified by calling free, fair and credible elections at the earliest and allowing people to choose their leaders who would save them from an economic disaster.

The PTI chairman also urged the judiciary to respond at this "defining moment" and ensure that democracy and fundamental rights of people were protected. He also reminded the judiciary that the incumbent government had appointed what he called anti-PTI caretaker governments, which were reluctant to hold elections in Punjab and Khyber Pakhtunkhwa within the constitutional limit of 90 days.

"If the elections will not be held within 90 days, the violators will be facing Article 6 (high treason)," he observed.

Mr Khan also urged the nation to rise to the moment and be ready to wage a "jihad" to attain 'real independence' (haqqeqi azadi). "I assure the

Continued on Page 5

'Plan C' to kill me hatched by Asif Zardari, Imran alleges

Continued from Page 1

nation that I will fight for this country and the nation till my last breath or, in cricketer terminology, last ball," he stressed and hoped he would fully recover in the next two weeks to come out on the streets again.

Following the rupee's historic fall against the US dollar, the PTI

chief lashed out at the government and predicted massive inflation and "insurmountable" economic challenges in the days to come, particularly for the salaried class. He also said the opposition members were being treated as "traitors" and politicians and journalists being tortured and threatened not to speak up against the rulers. "Even I am facing 70 different

FIRs," he regretted.

"The government is trying to instill fear in the masses to force them to accept the rulers, who are busy in getting their corruption cases cleared besides amassing more wealth through corruption," he alleged. "People must break the shackles of fear and stand up for their fundamental rights and country's prosperity."