

BY COURIER & EMAIL

28th February, 2018

To,

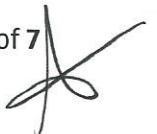
1. The NGO Shipbreaking Platform
Through its Executive Director and Founder,
Ms. Ingvild Jenssen
Rue de la Linière/Vlasfabriekstraat, 11 B-1060
Brussels, Belgium
Tel.: +32 (0)2 6094 419
E-mail: ingvild@shipbreakingplatform.org

2. Ms. Ingvild Jenssen
In personal capacity & as
Executive Director and Founder, of
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Brussels, Belgium
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3. Ms. Patrizia Heidegger,
Former Executive Director, of
The NGO Shipbreaking Platform
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34, Boulevard de Waterloo
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Tel: +32-22891090
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4. Mr. Jim Puckett,
In personal capacity & as

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Founding Member, of
The NGO Shipbreaking Platform
Rue de la Linière/Vlasfabriekstraat, 11 B-1060
Brussels, Belgium

5. Francesca Carlsson
In personal capacity & as
Corporate Liaison and Policy Officer, of
The NGO Shipbreaking Platform
Rue de la Linière/Vlasfabriekstraat, 11 B-1060
Brussels, Belgium
6. Mr. Ritwick Dutta,
Board Member, of,
The NGO Shipbreaking Platform
Rue de la Linière/Vlasfabriekstraat, 11 B-1060
Brussels, Belgium
Mobile No: +91-9654981029
E-mail: ritwickdutta@gmail.com
7. Legal Initiative For Forest And Environment
A registered Trust, bearing no. DL/2017/0166057,
Through its Trustee,
Mr. Ritwick Dutta,
N-71, Lower Ground Floor,
Greater Kailash-1, New Delhi-110048
Mobile No: +91-9654981029
E-mail: amarbisht@lifeindia.net.in
8. Toxics Link / The Just Environment Charitable Trust,
A registered Trust, bearing no. DL/2017/0166510,
Through its Trustee,
Mr. Ravi Shanker Aggarwal,
H2, Jungpura Extension, New Delhi – 110014
Website: www.toxicslink.org
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E-mail: pooja@toxicslink.org

Re: Notice for Defamation

Dear Sir/Ma'am,

I, acting on the instructions of and on behalf of my client "GMS-DMCC", Saba 1, Cluster E, JLT, Dubai, UAE, issue this Notice upon you for defamatory articles authored and published by you.

1. My client is involved in ship recycling business globally. You nos.1 to 6 are the publishers of the impugned articles. You no.1 has worldwide presence and operates globally through 19 member organization spread in about 10 countries; including you nos. 7 and 8 in the Indian Sub-continent.
2. My client is shocked and surprised to read the impugned articles published by you as the same contain false, objectionable, hurtful and baseless averments. They are both factually incorrect as well as defamatory in nature. Within the past decade my Client has been continually portrayed as an accused purportedly claimed to be involved in certain unauthorized and illegal activities.
3. While there are numerous examples of the articles published and/or hosted on your website www.shipbreakingplatform.org specifically targeting our Client, without being exhaustive and merely by way of

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illustration your attention is brought to following articles. Kindly note such list is without prejudice and/or any limitations to my client's rights and my client reserves the right to point out more such examples of libel and/or slander at a later stage.

Article named 'Contaminated North Sea oil production and storage tanker ends up on the beach in Bangladesh' published on 27th October 2016 accessible on (www.shipbreakingplatform.org/platform-news-maersk-involved-in-illegal-toxic-waste-trafficking)

Article named 'Another catastrophic fire shakes Gadani shipbreaking yards' published on 10th January 2017 accessible on (www.shipbreakingplatform.org/platform-news-fire-on-greek-ship-raises-death-toll-in-pakistan)

Article named 'European institutions call on eu to address decommissioning of floating oil and gas structures' published on 3rd July 2017 accessible on (www.shipbreakingplatform.org/platform-news-european-institutions-call-on-eu-to-address-decommissioning-of-floating-oil-and-gas-structures)

Article named 'Ngos maintain pressure on owners and scrap dealers of fpso north sea producer' published on 13th September 2017 accessible on (www.shipbreakingplatform.org/platform-news-ngos)

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Article named 'Dutch prosecutors press criminal charges against seatrade. Managers risk prison sentences and hefty fines for the illegal sale of end-of-life ships' published on 13th February 2018 accessible on (www.shipbreakingplatform.org/press-release-dutch-prosecutors-press-criminal-charges-against-seatrade)

Article named 'Platform publishes list of ships dismantled worldwide in 2017' published on 20th February 2018 accessible on (www.shipbreakingplatform.org/press-release-platform-publishes-list-of-ships-dismantled-worldwide-in-2017)

4. The impugned articles are not only a glaring case of incorrect reporting of factual details but the same have been published with mala-fide intent to adversely affect the goodwill and reputation of my client and to derail the mindset of readers towards ship recycling industry of Alang, India. Such publications are ex-facie defamatory and cause severe negative reputational and business impact to my Client.

5. Upon further perusal of the available details, my client is convinced that you are habituated to author, host, broadcast, circulate and comment, on my client, its authorized personnel and their family

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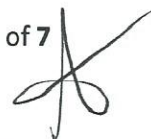
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members and specifically target them so as to harm their reputation and goodwill. My client is also convinced of your repeated attempts to continually derail the ship recycling industry of India (at Alang) and any positive development occurring within it. There is not an iota of truth in such statements and the same are backed by no facts or figures. By no stretch of imagination, it can be said that they are published for public good.

6. For your actions, my Client is continually questioned and subjected to contempt and ridicule and has suffered immense prejudice, loss of reputation, business standing and goodwill in the industry both in-person and as a responsible corporate organization. Your publication has tarnished the image and goodwill of my client.

7. In the premise aforesaid, you are hereby called upon to immediately,
 - (a) Tender an unconditional apology on your website and remove all articles that are defamatory and aimed against my Client, its personnel's and their family members;
 - (b) Ensure in future to publish/host and broadcast true and correct facts on your website after checking the veracity of the same.
 - d) Stop any further recirculation of the impugned articles.

In the event of your failure to do the above within a maximum of three calendar days, our Client shall be constrained to initiate



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proceedings, both civil and criminal, including not limited to seeking monetary damages, against You and all concerned behind the impugned publication. Needless to mention that any such proceeding, if initiated, shall be solely at your risk, as to cost and consequence.

A copy of the instant notice has been retained in our office for further necessary action, if required.

Regards,



Manav A. Mehta
Advocate

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