

YACHANA
ADVOCATE
DELHI HIGH COURT

To,

1. M/s KW Buildcons Pvt. Ltd.

2. M/s KW Infrabuild Pvt. Ltd.

Both address:- B-97, Sector-63, Noida,

Gautam Budh Nagar, U.P. 201301

Through their Advocate,

Sh. Pawan Kumar Choudhary, Advocate

Plot No. 113, Udyog Vihar Extension, Ecotech-II

Greater Noida, G.B. Nagar, U.P. -201308

Subject: **Reply to your alleged Legal Notice dated 27.01.2026**

Sir

1. Preliminary Denial: Under instructions from and on behalf of our clients, namely Mr. Vikas Bhasin, M/s Saya Homes Pvt. Ltd. and M/s Saya Buildcon Consortium Pvt. Ltd., we hereby categorically deny each and every allegation, contention, assertion, and imputation contained in your legal notice dated 27.01.2026, except those expressly admitted herein. The said notice is misconceived, legally unsustainable, and appears motivated solely to create undue pressure on unrelated third parties.
2. Private Dispute Not Binding: Your clients have wrongly sought to extend a private commercial dispute with certain land-owning entities to bind our clients, who are unrelated third parties. Such projection is impermissible under law and is expressly denied.

No Privity of Contract or Obligation

MOB. 8958629714, EMAIL:- YACHANA2003YADAV@GMAIL.COM
ADD. FLAT NO. 812, TOWER-1, PARAS SEASONS, NOIDA, U.P.

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3. It is denied that our clients are parties to, signatories of, or bound in any manner by the alleged Memorandum of Understanding dated 02.03.2013 or any other arrangement asserted by your clients.
4. Any rights, interests, liens, charges, or arbitration claims by your clients, if existing, stem exclusively from their dealings with third parties. Our clients are complete strangers to these arrangements and cannot be held liable therefor.
5. Attempts to restrain our clients based on alleged encumbrances, disputes, or arbitral proceedings to which they are not parties are legally untenable.
6. Absent any court order, injunction, or statutory prohibition, your notice cannot impose any embargo on our clients' lawful activities.

Denial of Consequences and Threats

7. Allegations of wilful interference, tortious acts, or civil/criminal liability by our clients are baseless, speculative, and denied. These appear intended to intimidate.
8. Our clients reserve all rights to pursue legal remedies against any false, defamatory, or misleading communications impacting their reputation or interests.

Clarification Without Prejudice

9. Without prejudice to the foregoing and without admitting any liability, we clarify that our clients have not, as of date, entered into any arrangement regarding the referenced land.

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Reservation of Rights

- 10.** This reply is without prejudice to our clients' rights, remedies, and contentions under law and equity, all expressly reserved.

Yours faithfully,



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