

**IN THE COURT OF THE HON'BLE IV ADDITIONAL CHIEF
METROPOLITAN MAGISTRATE AT HYDERABAD**

Crl. M.P. No.27 OF 2025

in

SR. No.4472 OF 2025

Between:

A. Srilatha

... Petitioner / Complainant

AND

Kumbham Shiva Kumar Reddy & 6 others

... Respondent / Respondent No.4

COUNTER FILED ON BEHALF OF ACCUSED NO.4

May it please your honor

The Respondent No.4, Ms. Meenakshi Natarajan, AICC In-charge of Telangana State, most respectfully submits this Counter to the Advancement Petition filed by the Petitioner/Complainant and states as follows:

PRELIMINARY OBJECTIONS:

1. ABSENCE OF GENUINE URGENCY

1.1 The Petitioner has failed to demonstrate any genuine, compelling, or emergent circumstances that would warrant the advancement of the hearing from 17/11/2025 to 08/10/2025.

1.2 The allegation that Accused No.1 is "leaving abroad" is entirely unsubstantiated, unverified, and appears to be a convenient pretext to accelerate proceedings without lawful justification.

1.3 The advancement petition is a blatant misuse and abuse of the judicial process, designed to harass the Respondents and gain tactical advantage rather than serve the interests of justice.

2. MALAFIDE PROSECUTION AND POLITICAL VENDETTA

2.1 This Respondent submits that the entire complaint is actuated by malice, political rivalry, and personal vendetta, and is devoid of any merit or substance.

2.2 This Respondent has been falsely implicated in this matter despite having no role whatsoever in the incidents alleged by the Petitioner.

2.3 The allegations against this Respondent are politically motivated and are an attempt to malign the reputation of a senior national-level political functionary.

FACTUAL SUBMISSIONS

3. ROLE AND POSITION OF THIS RESPONDENT

3.1 This Respondent is a senior leader of the Indian National Congress and was appointed as AICC In-charge of Telangana State by the party high command to oversee organizational matters and coordinate party activities in the state.

3.2 This Respondent's role is purely organizational, administrative, and strategic in nature, relating to party management, coordination, and implementation of party policies and programs.

3.3 This Respondent has no personal relationship with Accused No.1 (Kumbham Shiva Kumar Reddy) and has never met or interacted with him in any personal capacity.

4. ALLEGATIONS REGARDING SUSPENSION STATUS

4.1 The Petitioner has made misleading and factually incorrect statements regarding this Respondent's alleged communication about the suspension of Accused No.1.

4.2 This Respondent categorically denies having made any false or misleading statement to the Petitioner regarding the suspension status of Accused No.1.

4.3 Any communication made by this Respondent was based on information available to her in her official capacity and was made in good faith.

4.4 The Petitioner's allegation that this Respondent refused to provide a letter regarding suspension is taken out of context and misrepresented. Party disciplinary matters are handled through proper channels and procedures, not through individual correspondence.

5. ALLEGATIONS REGARDING APPOINTMENT OF ACCUSED NO.2

5.1 The Petitioner has alleged that this Respondent appointed Accused No.2 (Smt. Chittem Parnika Reddy) as General Secretary of TPCC despite knowing about the allegations.

5.2 This Respondent submits that all party appointments are made through proper consultation with the party high command, state leadership, and based on merit, organizational work, and political considerations.

5.3 The appointment of Accused No.2 was made in her capacity as an elected MLA and active party worker, and was not made to "protect" or "support" Accused No.1 as maliciously alleged.

5.4 Party appointments are internal organizational matters and cannot be the subject of criminal proceedings.

6. NO SPECIFIC CRIMINAL ACT ATTRIBUTED

6.1 The Petitioner has failed to attribute any specific criminal act or omission to this Respondent under the sections alleged (356, 61, 45, 46, 35(10)(2), 3(5), and 79 of the BNS Act).

6.2 The allegations against this Respondent are vague, general, omnibus, and do not disclose any cognizable offence.

6.3 The Petitioner has merely named this Respondent as an accused without providing any specific details of when, where, and how this Respondent committed any alleged offence.

7. NO PRIMA FACIE CASE ESTABLISHED

7.1 There is absolutely no prima facie case made out against this Respondent. The complaint is bereft of any material particulars regarding this Respondent's alleged involvement.

7.2 The complaint appears to be a desperate attempt to drag senior party functionaries into a personal dispute between the Petitioner and Accused No.1.

7.3 The sections of law invoked against this Respondent have no application whatsoever to the facts alleged.

8. VICARIOUS LIABILITY NOT APPLICABLE

8.1 This Respondent cannot be held vicariously liable for the alleged actions of Accused No.1 or any other co-accused merely by virtue of her organizational position in the party.

8.2 Party functionaries cannot be made accused in criminal cases for discharging their legitimate organizational responsibilities.

8.3 The principle of personal culpability is fundamental to criminal law, and no person can be prosecuted without specific allegations of their involvement in the commission of an offence.

9. VIOLATION OF PRINCIPLES OF NATURAL JUSTICE

9.1 The advancement of hearing would seriously prejudice this Respondent's right to defend herself properly and would violate principles of natural justice.

9.2 This Respondent requires adequate time to gather relevant documents, consult legal counsel, and prepare a comprehensive defence.

9.3 The rushed advancement would deny this Respondent a fair opportunity to present her case.

10. PROTECTION OF REPUTATION AND DIGNITY

10.1 This Respondent is a senior national leader with decades of public service and an unblemished reputation.

10.2 The false and malicious allegations have been made with the deliberate intention to tarnish the reputation and dignity of this Respondent.

10.3 The advancement of proceedings would cause irreparable damage to the reputation of this Respondent and would be a travesty of justice.

11. ALTERNATIVE REMEDIES AVAILABLE

11.1 If the Petitioner has genuine concerns about Accused No.1 leaving the country, appropriate applications can be made and Petitioner has alternative remedies rather than seeking advancement of the hearing.

11.2 There is no justification for advancement of hearing against all accused merely on the ground that one accused may be leaving the country.

PRAYER:

In view of the above submissions, it is most respectfully prayed that this Hon'ble Court may be pleased to:

- a) DISMISS the Advancement Petition filed by the Petitioner as being devoid of merit, malafide, frivolous, and an abuse of the process of law;
- b) MAINTAIN the scheduled hearing date of 17/11/2025 and allow the case to proceed in due and ordinary course of law;
- d) AWARD appropriate costs against the Petitioner for filing this vexatious and frivolous petition;
- e) Pass such other order(s) as this Hon'ble Court may deem fit and proper in the circumstances of the case and in the interest of justice.

Place: Hyderabad

Date: 24/10/2025

Counsel for Respondent No.4

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ACCUSED NO.4

Filed on: 24-10-2025

Filed by: Counsel for Respondent No.4

M/s. Patron Law Associates

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