

At the outset I would like to categorically state that neither SAM nor I have entered into any conspiracy, much less criminal conspiracy with Dorothy Thomas. I would like to repeat and reiterate that I have not, and have never asked anyone of Dorothy or her team to leave CAM nor have I induced them in any manner.

Dorothy and her team had approached me after they had decided to leave CAM on account of the oppressive behavior by the management of CAM who had decided to shut down the operations of the Chennai office within 1 month, without in any manner thinking or caring for them. In view of CAM's decision to close down their Chennai operations, these lawyers wanted to pursue their legal careers with SAM. It is the Chennai team that sought my guidance on issues of their resignation etc which I guided them on. They had decided to leave and I insisted that no original documents or records, whether pertaining to litigation or transactions, was either consciously or inadvertently left in the possession of any lawyer who resigned. I had mentioned this for their own protection.

On the 24th of September 2016, Dorothy and her colleagues, intimated to me their desire to en masse leave CAM as: (i) since mid-August, Cyril Shroff, Vandana Shroff, L Vishwanathan and Arjun Lall had communicated to her and her entire team that the management had taken a decision to shut down the Chennai operations with a view to concentrate only on 3 offices of Mumbai, Delhi and Bangalore; (ii) despite their having exceeded their targets for a 6 month period, CAM had not reset their retainers and salaries, not promoted the retainers and not paid pro rata bonus for the extra ordinary performance; and (iii) she was unwilling to run a solo operation which involved financial obligations 4x beyond her livelihood and the associates wanted to work with a known brand. Dorothy expressed that at meetings in Mumbai, they had already been told that if they did not fall in line, they would be given one month's notice and asked to leave. She expressed that her entire team was with her and that they would like to speak with me on Sunday (25 September 2016) via Skype.

I was informed of the aforesaid facts during a Skype call on 25th September 2016 on which all entire Chennai team participated. They expressed that they were very disappointed with the management of CAM unilaterally deciding to shut down the Chennai operations, without concern of the fact that the market had been single-handedly developed by their team. They informed me that they had decided to participate on the Skype call as each of them had already decided to leave CAM and wanted to explore their options with SAM, which had just opened its office in Chennai. .

On the Skype call, each of them expressed that they would tender a joint resignation to CAM, however, since there were individual retainerships with CAM, individual letters of resignation had to be issued. In this context, the Chennai team sought my guidance on termination of the retainerships and arrangements with CAM and to that extent I guided them. Further, unless they had resigned on the basis of what they had narrated to me, the question of providing them a retainer at SAM would not have arisen.

On the call they expressed their strong desire to join SAM and requested for draft retainership agreements.

I had clearly indicated that this process of handover must be orderly and every single asset that was in the custody or control of the individual lawyers should be made over to CAM. Since they had official mobile phones that had to be surrendered upon their suo moto resignation from CAM, they were requested to copy their phone directories on their personal phones.

I believe that on 3rd October 2016, all the Chennai associates who had decided to leave CAM before they reached out to me, tendered their resignations and I am told by Dorothy that she had told her Bangalore colleagues to come down and take possession of the Chennai office. I further understand that on the 4th of October, Dorothy met Arjun Lall, Arun Prabhu and another partner of CAM. She handed over what was delivered to her by her associates.

In my communications with all the lawyers who had decided to leave, I had clearly exhorted them to ensure that no original documents or records whether pertaining to litigations or transactions is either consciously or inadvertently left in their possession, as I did not want anything from CAM.

I was informed by Dorothy that, at 7.30AM on the 5th of October she had received a threatening e mail from Cyril intending criminal action against her. I do know that Dorothy tendered her resignation on the evening of the 5th of October, due to the events that occurred on 4th and 5th of October with immediate effect as she was being severely harassed. I am unaware whether CAM has filed the e mails of the 5th of October between Cyril and Dorothy in the proceedings.

I am indeed surprised at CAM's management intimidating a single mother who headed their office in Chennai, and who is pursuing her career elsewhere after CAM's decision to shut down their Chennai operations.

I trust this clarifies the circumstances of the en masse exit from CAM Chennai.