

'Exhibit - F'

O/C

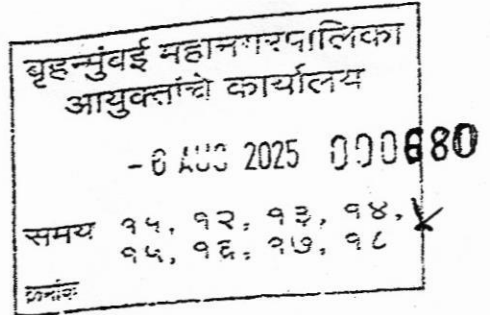
Ref:301/YJB/2025

By Hand Delivery/ Speed Post AD

5th August 2025

To,

- 1) The Municipal Commissioner,
Municipal Corporation of Greater Mumbai,
Annex Building, Mahapalika Marg No. 1,
Opposite CSMT Railway Station,
Besides Times of India Building, Fort,
Mumbai - 400 001.



Kind Attn: Dr. Bhushan Gagrani, IAS

- 2) Assistant Municipal Commissioner (AMC)
Assistant Municipal Commissioner (G/South Ward)
G/South Ward Office (1st Floor),
Dhanmill Naka, N. M. Joshi Marg,
Mumbai - 400013

Kind Attn: Shri Sharad N. Ughade

Dear Sir,

Re: Request for reconsideration of the blanket ban on feeding of birds and other animals and removal of the purported banner put up by You Nos.1 and 2 prohibiting such feeding at Mahalaxmi Race Course

We are concerned for our client, Mr. Nirav Kumar Dave ("our Client"), having his address at 428, Rawal Building No.1, 1st floor, Opp. IndusInd Bank, D.B. Marg, Laxington Road, Mumbai - 400 004, who has instructed us to address You Nos. 1 and 2 as under:



1. Our Client, an environmentalist, law-abiding citizen and dedicated animal welfare advocate residing in Mumbai, has for over two decades, been compassionately feeding birds and other smaller animals at Mahalaxmi Race Course in a defined open ground situated along the eastern periphery of the Mahalakshmi Race Course. This area has been used as a feeding area for as long as our Client can remember and this feeding area is situated outside the inner track of the Mahalakshmi Racecourse, on what may be described as the outer buffer zone or non-operational periphery of the Racecourse complex.
2. Over the years, our Client has primarily observed and fed various exotic bird species such as kites, eagles, crows, sparrows, parrots, kites, kowals and the like at the said feeding area at Mahalaxmi Race Course. The said activity is carried out without obstruction to public use, without any commercial objective, and solely in pursuit of animal welfare and ecological sustenance. Our Client has always maintained hygiene and environmental discipline at all times during such feeding.
3. It was for the first time on 24th July 2025, that the security personnel deployed at the Mahalaxmi Racecourse actively prevented our Client from feeding birds. On being questioned by our Client as to why this new restriction was being imposed, the security personnel drew our Client's attention to a banner purportedly put up by You No.2 on instructions of You No.1 which explicitly stated a ban on feeding 'pigeons and other birds' due to concerns about "bird flu" and "Hypersensitivity Pneumonia (HIP)" from droppings, and further warning of a ₹500 fine under Bye-law 4.5 of the BMC Health Bye-Laws, 2006 ("Purported Banner"). A picture of the Purported Banner is annexed hereto as Annexure - "A". Our Client was also verbally informed by the security guard that this prohibition stemmed from a purported direction or order of You No.1 dated 3rd July 2025.
4. Whilst our Client is conscious of the restrictions pertaining to feeding pigeons at Kabutarkhanas and the nationwide crackdown on Kabutarkhanas due to the alleged dangers of pigeons and pigeon droppings to human life, our Client submits that the Mahalaxmi Race Course cannot be treated on the same footing as Kabutarkhanas. This is because Kabutarkhanas are located right in the midst of residential areas, in the populated part of the city whilst the Mahalaxmi Race Course is a large green open space,



with the nearest habitable residential building being more than 200 mtrs away from the feeding spot. Further, our Client reiterates that the birds spotted at the feedings at Mahalaxmi Race Course are birds such as kites, eagles, crows, sparrows, parrots, kites, koyals, amongst others and even squirrels. Thus, the risks, if any, associated with feeding of pigeons, in any event, cannot apply to the other birds being fed at Mahalaxmi Race Course.

5. Our Client states that this punitive action has been taken by You Nos.1 and 2 without the issuance of any formal notice, without conducting any site-specific assessment, and without affording our Client or other members of the general public who are regulars at Mahalaxmi Race Course, an opportunity of being heard. Our Client states that this action by You Nos.1 and 2 is a misapplication of Bye-law 4.5 of the BMC Health Bye-Laws, 2006 and violative of Articles 14, 21, 25, and 51A(g) of the Constitution of India.
6. In the circumstances, our Client hereby requests You Nos.1 and 2 to forthwith:
 - (a) reconsider the blanket ban on feeding of birds that has been imposed by You Nos.1 and 2;
 - (b) remove the Purported Banner at Annexure A from the entry gate at Mahalaxmi Race Course; and
 - (c) refrain from preventing our Client and other samaritans from feedings birds at the feeding area at Mahalaxmi Race Course.
7. Our Client remains hopeful that your office will address this matter with the seriousness it deserves and will take swift action in the interest of justice, public accountability, and adherence to the rule of law.

Yours faithfully,
For Yasmin Bhansali & Co.


(Partner)
Advocates & Solicitors

Encl: As Above



Vendor Code : 107445

Date : 10/12/2023

		DTDC Express Limited Regd. Office: No-3, Victoria Road Bengaluru - 560047		ORIGIN	DEST.
POUCH NO.		DATE			
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1 Sender's (Consignor) Name: _____ Company Name & Address: <u>yesmin Bhargava</u> <u>Bhargava</u> City: <u>Mum</u> State: _____ PIN Code: _____ Sender's GSTIN*: _____			2 Recipient's (Consignee) Name: _____ Company Name & Address: <u>Assistant Municipal</u> City: <u>Mum</u> State: _____ PIN Code: <u>13</u> Recipient's GSTIN*: _____		
3 Nature of consignment (✓) <input type="checkbox"/> Dox <input type="checkbox"/> Non-Dox <input type="checkbox"/> Total Num Pcs: _____ DIM 1: L _____ cm X B _____ cm X H _____ cm X _____ Pcs Actual Wt.: _____ kg DIM 2: L _____ cm X B _____ cm X H _____ cm X _____ Pcs Volumetric Wt.: _____ kg DIM 3: L _____ cm X B _____ cm X H _____ cm X _____ Pcs Chargeable Wt.: _____ kg			4 Description of Content _____ Total Value of consignment for carriage / E-Way bill _____		
5 Paper Work Enclosures _____			6 Type of consignment (✓) <input type="checkbox"/> Commercial <input type="checkbox"/> Non Commercial <input type="checkbox"/> 7 Value Added Services <input type="checkbox"/> Not Available <input type="checkbox"/> CN Expiry Date _____		
10 I/We declare that this consignment does not contain personal mail, cash, jewellery, contraband, illegal drugs, any prohibited items and commodities which can cause safety hazards while transporting.			9 Charges Amount(₹) a) Tariff (Incl. of FSC + Taxes) _____ b) Risk Surcharge <u>100/-</u> c) Total amount (a+b) _____ Above charges are inclusive of GST & other taxes if applicable Mode of Payment: Cash <input type="checkbox"/> Card <input type="checkbox"/> Wallet <input type="checkbox"/>		
11 Booking Branch / Franchisee Code _____			8 Mode (✓) <input type="checkbox"/> Surface <input type="checkbox"/> Air Cargo <input type="checkbox"/> Express <input type="checkbox"/> Consignment Number: <u>M51765950</u>		
12 Risk Surcharge _____			Owner _____ Carrier _____		
13 Courier Signature _____					
Sender's Signature & Seal <u>6/18/25</u> Date: _____ Time: _____ AM/PM I have read and understood terms & conditions printed overleaf of this consignment note and I agree to the same.					

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Jan. 2024

