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MEMORANDUM OF LEGAL OPINION

DATE:	12 February 2025
TO:	EFPI Technologies Private Limited
FROM	Cyril Amarchand Mangaldas
RE:	Memorandum related to online real money games

1. FACTUAL BACKGROUND

- 1.1. We understand that EFPI Technologies Private Limited (“**Company**”) is a company incorporated and registered under the laws of India. The Company is engaged in the business of operating and maintaining a website <https://efpitgaming.com/> (“**Website**”). Through this Website users can download an application named “EFPIT Gaming” (“**app**”) to play online games of rummy.
- 1.2. The Company through its app offers its users multiple varieties of rummy cash games i.e., Pool, Points and Deal (“**Rummy Games**”). The Rummy Games varieties differ in terms of bet value, value of unarranged cards and number of games, in order to declare the winner. To play Rummy Games, a user is required to register on the app and pay requisite fee which is charged at the percentage rate specific to each game applied to the pooled money / winnings in a particular game.
- 1.3. Rummy is a card game that is played with a standard deck of 52 cards. The game is typically played by two to six players, and the objective is to form sets or runs of cards and be the first player to get rid of all the cards in your hand. A set is a group of cards of the same rank but different suits, and a run is a sequence of cards of the same suit. On the player’s turn, the player can draw a card and discard one. The game continues until a player gets rid of all their cards, and the remaining players score penalty points based on the cards in their hand. The player with the lowest total score at the end wins the game.
- 1.4. The game of rummy or any such games played with cards, dice, tables or other instruments of gaming are governed under the laws made in respect of betting and gambling in India. The State Legislatures are specifically empowered to enact state-specific laws to regulate betting and gambling and also laws concerning taxation thereof.

2. ISSUE DEALT WITH IN THE OPINION

- 2.1. Whether Rummy Games are construed as ‘game of skill’ or ‘game of chance’ in terms of the present Indian law(s) that regulate online gaming?





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3. LEGAL AND REGULATORY FRAMEWORK

Overview of gambling legislations in India

- 3.1. Pursuant to India's federal structure of governance, the Constitution of India ("Indian Constitution") divides the legislative powers between centre and state. Before coming into force of Indian Constitution, 'gambling' in India was governed through Public Gambling Act, 1867 ("Public Gambling Act") which was enacted by erstwhile British rulers, and which was applicable to certain specified provinces as existed prior to Indian independence. With adoption of the Indian Constitution in the year 1949, the respective states have been given the power to legislate on "betting and gambling", pursuant to Entry 34 of List II of Schedule VII of the Indian Constitution.
- 3.2. With states being conferred with powers to legislate on 'betting and gambling', as indicated above, the Public Gambling Act ceased to be a central legislation. However, most of the states such as Madhya Pradesh, Punjab, Uttar Pradesh etc. have passed enactments adopting the Public Gambling Act, either as-it-is or with certain amendments. Whereas certain other states such as Assam, Goa, Orissa etc. have enacted their own 'gambling' legislation.
- 3.3. Section 12 of the Public Gambling Act provides an exemption with regard to 'games of mere skill' from the application of penal provisions of the law. Most state legislations also distinguish games of mere skill from games of chance and carve out an exception for games of skill from the application of the penal provisions of the law. Furthermore, nearly all state legislations prohibit and penalise 'gambling'. While there is no common definition/explanation to the term 'gambling' under the state legislations, it has generally been explained to include all forms of 'wagering' or 'betting'. In the context of games that involve 'wagering' or 'betting' (hereinafter referred as "**Betting Game(s)**"), in most of the states, Betting Games when identified as 'game of chance' are treated as 'gambling' and accordingly penalized.
- 3.4. The gambling laws in India are prohibitory in nature. The Public Gambling Act provides for the punishment of public gambling and the keeping of 'common gaming houses'. This is true for other gaming legislations as well which, *inter alia*, penalize owning or keeping or having charge of a gaming house¹ / common gaming house, for being found in common gaming house, etc., possession of any instruments of betting or records of betting², furnishing of money for the purpose of gaming with persons frequenting common gaming houses.

¹ Section 3 of the Delhi Public Gambling Act, 1955

² Section 8 of the Assam Game and Betting Act, 1970





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3.5. “Common Gaming House” has been defined under various gaming legislations. By way of examples, it has been defined as follows:

under the Public Gambling Act to mean:

“any house, walled enclosure, room or place in which cards, dice, tables or other instruments of gaming are kept or used for the profit or gain of the person owning, occupying, using or keeping such house, enclosure, room or place, whether by way of charge for the use of the instruments of gaming, or of the house, enclosure, room or place, or otherwise howsoever”³

under the Andhra Pradesh Gaming (Amendment) Act, 2020 to mean:

“Common Gaming House means any house, room, tent, enclosure, vehicle, vessel, cyber space or any place whatsoever in which any instrument of gaming are kept or used for the profit or gain of the person owning, occupying, using or keeping such house, room, tent, enclosure, vehicle, vessel, cyber space or any place whether by way of charge, for the use of such house, room, tent, enclosure, vehicle, vessel, cyber space or any place or instruments of gaming or otherwise howsoever”⁴.

under the Odisha Prevention of Gambling Act, 1955 to mean:

“any house, room, tent, enclosure, space, vehicle, vessel or place where gaming or gambling takes place or where instruments of gaming are kept or used for gaming or gambling therein”⁵.

3.6. “Instruments of Gaming” have also been defined under various gaming legislations. By way of examples, it has been defined as follows:

under the Jammu and Kashmir Public Gambling Act, 1997 to mean:

“Instrument of gaming includes any article used as a means or appurtenance of or for the purpose of carrying on or facilitating gaming.”

under the Andaman and Nicobar Islands Public Gambling Regulation, 1951 to mean:

“any card, dice counters, coins, gaming tables, gaming cloth, gaming board or other articles devised or actually used for the purpose of gaming”.

³ Section 1 of the Public Gambling Act.

⁴ Section 2(1)(ii) of the Andhra Pradesh Gaming (Amendment) Act, 2020

⁵ Section 2(a) of the Odisha Prevention of Gambling Act, 1955





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- 3.7. Certain states in India have amended their gambling legislations to define instruments of gaming to include “online electronic transfer of funds or transactions”⁶ and “computer, computer resource, computer network, computer system or by mobile app or internet or any communication device, electronic application, software or any virtual platform”⁷ and prescribe monetary penalties and imprisonment for offences.
- 3.8. States such as Andhra Pradesh⁸, Karnataka⁹, Tamil Nadu¹⁰, Telangana¹¹, Sikkim¹² and Nagaland¹³, have enacted legislation to expressly cover online gaming.
- 3.9. Gambling” or “gaming”, as per most gambling legislations, has been defined to include three key elements: (i) the act of wagering or betting (ii) for money or money’s worth (iii) on a game of chance. The following exceptions have been made under most gambling legislation for “gambling” or “gaming”:
- wagering or betting upon a horse race/dog race if such wagering or betting takes place in certain circumstances;
 - games of mere skill; and
 - lotteries.

By way of examples, it has been defined as follows:

under the Orissa Prevention of Gambling Act, 1955 to mean:

“Gambling or gaming does not include lottery and means a play or game for money or other stake and includes betting and wagering and other act, game and contrivances by which a person intentionally exposes money or things of value to the risk or hazard of loss by chance.”¹⁴

under the Delhi Public Gambling Act, 1955 to mean:

⁶ Section 2(4) of the Telangana Gaming Act, 1974 and Section 2(4) of The Andhra Pradesh Pradesh Gaming Act, 1974.

⁷ Section 2(11) of the Karnataka Police Act, 1963.

⁸ Andhra Pradesh Gaming Amendment Act, 2020.

⁹ Karnataka Police Amendment Act, 2021.

¹⁰ Tamil Nadu Prohibition of Online and Regulation of Online Games act, 2022

¹¹ Telangana Gaming Amendment Act, 2017

¹² Sikkim Online Gaming (Regulation) Act, 2017

¹³ Nagaland Prohibition of Gambling and Promotion and Regulation of Online Games of Skill Act, 2015

¹⁴ Section 2(b) of the Orissa Prevention of Gambling Act, 1955.





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“Gaming to include wagering or betting except wagering or betting upon a horse race when such wagering or betting takes place on the day on which such race is to be run and in an enclosure which the stewards controlling such race have with the sanction of the State Government set apart for the purpose, but does not include a lottery.”¹⁵

- 3.10. In *Bimalendu De and etc. v. Union of India and Ors*¹⁶ (“**Bimalendu Case**”) the Calcutta High Court examined the definition of “gambling” as provided in the Black's Law Dictionary, 6th Edition and observed that “as per the dictionary meaning of gambling it is more than apparent that the essential element is wagering or betting”. It ruled that both these elements: wagering and betting were totally missing in the relevant game (the television show titled ‘Kaun Banega Crorepati’) and that nothing was at stake of the participant, and therefore it did not qualify as a case of gambling.
- 3.11. The Law Commission of India in July 2018 released its report on the “Legal Framework: Gambling and Sports Betting Including in Cricket in India”, Report No. 276 (“**LCR**”). The LCR has described betting and gaming as follows:

“Betting can simply be defined as an act of putting at stake a wagering amount (valuable or liquid cash) on the prediction of occurrence or non-occurrence of an event. It is always done against a second party who places his stake against the one placed by the first party. Neither of the parties that have put at stake their wagering amounts should have any control over the event on which the amount is wagered. On the other hand, gaming includes a game of chance or skill or a combination of both. Examples of such gaming activities would include Poker, Pool, Billiards, Fantasy Football, Internet Games, Crap, Roulette and Slot Machines.”

- 3.12. As per our analysis of the state legislations, **in terms of exemption to games of skill, the states can be classified into 3 categories – (i) games of skill permitted without license; (ii) games of skill prohibited; and (iii) games of skill permitted with license.**

I **Games of skill permitted without license**

Andaman & Nicobar Islands, Bihar, Chandigarh, Chhattisgarh, Dadar & Nagar Haveli, Daman & Diu, Delhi, Rajasthan, Goa, Gujarat, Haryana, Himachal Pradesh, Jammu & Kashmir, Jharkhand, Karnataka, Kerala, Ladakh, Lakshadweep, Madhya Pradesh, Maharashtra, Manipur, Mizoram, Puducherry, Punjab, Tripura, Uttarakhand, Uttar Pradesh, Tamil Nadu.

II **Games of skill prohibited**

Andhra Pradesh, Arunachal Pradesh, Assam, Orissa and Telangana

¹⁵ Section 2(1)(i) of the Delhi Public Gambling Act, 1955.

¹⁶ *Bimalendu De and etc. v. Union of India and Ors*, AIR 2001 Cal 30



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III Games of skill permitted with license

Meghalaya, Nagaland, Sikkim, West Bengal

- 3.13. The Supreme Court in *Dr. K.R. Lakshmanan v. State Of Tamil Nadu*¹⁷ (“**Lakshmanan Case**”) outlined the scope of gambling and defined it to mean, ‘*the payment of price for a chance to win a prize*’. **Hence, for an activity to be construed as gambling would necessarily satisfy 3 essential elements as laid down in Lakshmanan Case, which are - (a) staking of an amount i.e., consideration, (b) an element of uncertainty i.e., chance and, (c) a reward which is usually higher than the amount staked.**
- 3.14. As per the factual background, every user upon becoming the registered user of the app is required to pay the applicable entry fee to enter the Online Games contests and win cash prizes. **Therefore, Online Games would involve payment of cash for participation and also envisage a reward in monetary terms for players. As encapsulated under paragraph 3.5 above, the two elements i.e., consideration and reward shall be satisfied in the case of Online Games.**
- 3.15. Accordingly, the determination of whether or not such online games may be construed as ‘gambling’ and thereby subject to prohibition and penalty as stipulated in several state legislations, shall depend on whether the element of skill predominates the element of chance or vice versa. In this regard, it is important to analyse the jurisprudence differentiating ‘games of skill’ from ‘games of chance’, and such analysis has accordingly been undertaken in subsequent para(s) of this memorandum.

Games of skill v. Games of chance

- 3.16. The contours of what constitutes ‘game of **mere** skill’ and/or what differentiate ‘game of skill’ and ‘game of chance’ have over the years come up for deliberations at various courts of law in India and thereby the guidance on these terms is obtained largely from various judicial pronouncements.
- 3.17. In order to distinguish a game of skill from game of chance, the courts have largely relied on the ‘dominant factor test’ or ‘test of preponderance’ i.e., whether the outcome of the game is substantially dependent upon the skill of the player rather than mere chance. Applying the principle of the dominant factor test or test of preponderance, the Supreme Court of India (“**SC**”) while settling the position on the game(s) of rummy in the case of *State Of Andhra Pradesh v. K. Satyanarayana & Ors.* (“**Satyanarayana Case**”)¹⁸ specifically held that the game of rummy is not a game of entire chance; it is mainly and preponderantly a game of skill. The SC went on to hold that:

“Rummy... requires certain amount of skill because the fall of the cards has to be memorized and the building up of Rummy requires considerable skill in holding and discarding cards. We

¹⁷ *Dr. K.R. Lakshmanan v. State Of Tamil Nadu*, 1996 SCC (2) 226

¹⁸ *State Of Andhra Pradesh v. K. Satyanarayana & Ors.*, 1968 SCR (2) 387



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cannot, therefore, say that the game of Rummy is game of entire chance. It is mainly and preponderantly a game of skill. The chance in Rummy is of the same character as the chance in a deal at a game of bridge. In fact, in all games in which cards are shuffled and dealt out, there is an element of chance, because the distribution of the cards is not according to any set pattern but is dependent upon how the cards find their place in the shuffled pack. From this alone it cannot be said that Rummy is a game of chance and there is no skill involved in it.”

- 3.18. The test of preponderance was reinforced and applied in the Lakshmanan Case where the SC while interpreting the term ‘mere skill’ re-iterated that the game of rummy is considered to be a game of skill. Further, ‘mere skill’ was interpreted to mean ‘*substantial degree or preponderance of skill*’. Further, the SC also distinguished between the game of skill and game of chance to describe ‘*game of skill*’ as *one in which success depends principally upon the superior knowledge, training, attention, experience and adroitness of the player and game of chance, on the other hand, is one in which the element of chance predominates over the element of skill.*’

4. ANALYSIS & CONCLUSION

- 4.1. Most state legislations as well as the Public Gambling Act does not contemplate any specific position, however, it may be relevant to note that the States of West Bengal, Nagaland and Meghalaya have specifically dealt with rummy under their respective legislations.
- 4.2. The West Bengal Gambling and Prize Competitions Act, 1957 in its definition of gaming includes wagering and betting but provides for a specific exemption for rummy. Similarly, Nagaland Online of Games of Skill Act and Meghalaya Gaming Act lists ‘rummy’ as game of skill.
- 4.3. Notably, the states of **Kerala, Telangana, Andhra Pradesh, Karnataka and Tamil Nadu** by amending their respective legislations have either imposed a prohibition on Betting Games or expanded the scope of games of chance, which has resulted in the blanket ban on all Betting Games including those where skill outweighs chance. Further, the state of Kerala vide amendment made to Kerala Gaming Act, 1960 in the year 2021 banned ‘online rummy when played for stakes’.
- 4.4. However, applying the principles laid down by the SC in Satyanarayana Case & Lakshmanan Case, the High Court of Kerala (“**Kerala HC**”) in *Head Digital Works Private Limited v State of Kerala*¹⁹ quashed the aforesaid amendment made to the Kerala Gaming Act, 1960 and held it to be arbitrary, illegal and violative of fundamental rights enumerated under Article 19(1)(g) and 14 of the Indian Constitution. The Kerala HC went on to hold that, ‘*the game of online rummy will also be a ‘game of skill’ and online rummy played either with stakes or without stakes remains to be a ‘game of skill’.*’

¹⁹ *Head Digital Works Private Limited v. State of Kerala*, (2021) 6 KLT 16
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Presently, the State Government of Kerala has appealed this judgment before the division bench of the Kerala HC and is currently pending.

- 4.5. Further, the High Court of Karnataka (“**Karnataka HC**”) in *All India Gaming Federation v State of Karnataka*²⁰, while striking off the amendment to the Karnataka Police Act, 1963 which banned and prohibited online gaming with stakes in the state of Karnataka held that, ‘the games of chance do not enjoy any constitutional protection since they constitute as criminal acts. However, games of skill by their very nature stand on a different footing.’ On similar lines, The High Court of Madras (“**Madras HC**”) in *Junglee Games India Private Limited v State of Tamil Nadu*²¹ (“**Junglee Games Case**”) struck down the amendment to the Tamil Nadu Gaming Act, 1960 and held that, ‘rummy.... is game of skill as they involve considerable memory, working out of percentages, the ability to follow the cards on the table and constantly adjust to the changing possibilities of the unseen cards.’ At present, both the state of Tamil Nadu and Karnataka have appealed their respective High Court’s judgement before SC, which have been clubbed together and are pending in the SC. However, during pendency of such appeal, the state of Tamil Nadu has enacted Tamil Nadu Prohibition of Online Gambling and Regulation of Online Games Act, 2022 which prohibits online gambling and online games of chance including rummy and poker, played for money or other stakes.
- 4.6. The amendments done by the Government of Telangana to the Telangana Gaming Act, 1974 and Andhra Pradesh to Andhra Pradesh Gaming Act, 1974 are pending before their respective High Courts.
- 4.7. Applying the legal principles as stipulated by the SC in Satyanarayana case and Lakshmanan Case in paragraph 3.9 & 3.10, Rummy Games can be regarded as games of skill as it includes various skill sets which outweighs the element of chance. The skill sets include:
- The user analyses the cards in hand and keeps a close watch on opponents to understand their strategy.
 - The user counts the value of their cards to calculate the percentage they obtain a specific card.
 - The user memorizes the fall of cards and employs skill in discarding and holding cards.
 - Although, there is an element of chance in respect of the way the cards are shuffled and dealt out, however, the outcome of the game is dependent upon the predominant skill of the user as discussed from points (a) to (c) which are: memory, working out percentages, ability to follow the fall of cards, predicting the possibilities of unseen cards and strategizing the game play accordingly.

²⁰ *All India Gaming Federation v. State of Karnataka*, 2022 (2) AKR 422

²¹ *Junglee Games India Private Limited v. State of Tamil Nadu*, AIR 2021 Mad 252





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- 4.8. It may, thus, be arguable that playing rummy requires a combination of several skills, such as strategic thinking, card memory, pattern recognition, probability assessment, risk management, adaptability, and observation & deduction, which, if effectively applied would increase the probability of a player's chances of winning in the game.
- 4.9. However, as explained above, the validity of the games mentioned above is dependent upon the treatment of such games as game of skill or chance under respective state legislations. **Therefore, basis the above analysis, the Rummy Games can be regarded as game of skill, unless specifically prohibited by state legislations as provided under paragraph 3.4.**
- 4.10. Basis our analysis, Rummy Games can be offered without a license under the relevant gaming laws in the states such as Andaman & Nicobar Islands, Bihar, Rajasthan, Chandigarh, Chhattisgarh, Dadar & Nagar Haveli, Daman & Diu, Delhi, Goa, Gujarat, Haryana, Himachal Pradesh, Jammu & Kashmir, Jharkhand etc., as their state legislations provide an exemption to 'games of mere skill'.
- 4.11. The Rummy Games are not allowed to be offered in the states of Andhra Pradesh, Arunachal Pradesh, Assam, Orissa, Tamil Nadu and Telangana. However, the same can be offered with license in the states of Meghalaya, Nagaland, Sikkim, West Bengal as they follow a license-based regime which is subject to licensing requirements.

Amendments to the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 ("Intermediary Rules") (amendments are referred to as "Online Gaming Rules")

- 4.12. In April 2023, the Union Ministry of Electronics and Information Technology ("MeitY"), by virtue of the rule-making powers available to the central government under the Information Technology Act, 2000 ("IT Act 2000"), implemented a new central legal framework for online gaming through amendments to the Intermediary Rules. These Online Gaming Rules propose a light-touch, co-regulatory regime whereby MeitY recognised, independent self-regulatory bodies ("SRB") will verify whether an "online real-money game" is to be made available to the general public or not in accordance with the baseline criteria prescribed by the Online Gaming Rules.
- 4.13. The Online Gaming Rules attempt to regulate computer resources through which users can access online games (or in simple terms - an intermediary). Such intermediaries are defined as an "online gaming intermediary" ("OGI") and the Online Gaming Rules prescribe intermediary due diligence obligations for them under the Intermediary Rules. Under the Online Gaming Rules, an online game can be a "permissible online game" if (i) it is not an online real-money game, or (ii) it is an online real-money game but is "verified" by an SRB in accordance with the baseline criteria prescribed by the Online Gaming Rules and any additional criteria prescribed by the SRB itself.





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4.14. Please note that Rule 4B of the Intermediary Rules²² provides that the obligations under Rules 3 and 4 of the Intermediary Rules shall not apply in relation to online games until the expiry of a period of three months from the date on which at least three SRBs have been designated under Rule 4A²³. However, the Central Government, may at any time before the expiry of the said three months, by a notification, direct that the obligations under Rules 3²⁴ and 4 of the Intermediary Rules shall apply in relation to an online game from a specified date. However, as the SRBs have not been notified yet, the Online Gaming Rules won't be applicable to the OIGs at present.

Other General Recommendations

4.15. Additionally, the Client may consider adopting measures recommended by the Law Commission in the 276th Law Commission Report to promote responsible gaming. Such measures include:

- a) focusing on safety and protection of players indulging in skill-specific games;
- b) obtaining licenses for games, where possible;
- c) capping the amount that an individual may invest in such games;
- d) conducting KYC of players and linking the cap to players' income brackets;
- e) restricting access to vulnerable sections of society such as children and people below poverty line; and
- f) ensuring that all transactions are digital in nature.
- g) adopting responsible gaming policies in order to minimize potential harm of promoting gambling addiction;
- h) adopting policies creating awareness among users regarding the pros and cons of gambling addiction related issues such as effect on mental health, effect of time spent on such games and impact of financial investment in such games; and
- i) collating statistical data on performance of skilled players verses performance of amateur players in a game to demonstrate where possible that skilled players perform better than amateur players.

²² Rule 4B of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021

²³ Rule 4A of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021

²⁴ Rule 3 of the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021





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ASSUMPTIONS & QUALIFICATIONS

Our responses and analysis in this Legal Opinion are subject to the following qualifications and assumptions:

- (i) Our analysis and responses in this Memorandum are based on the review of the application using the login credentials provided to us by the Client. This opinion is based on the analysis conducted for the game play as it exists based on such credentials as on date.
- (ii) Our responses set out in this Legal Opinion are based on the facts and background represented to us and as described in this Legal Opinion. The Legal Opinion does not address or purport to address, and should not be read as addressing, any other issue or legal or factual matter in addition thereto. Further, our analysis may change in the event the format of the fantasy games is varied from the format specified in this Legal Opinion;
- (iii) This Legal Opinion does not take into account views expressed by regulatory authorities unless the same have been specifically notified by them as law or regulation. We have not consulted with or sought the view of any governmental or statutory body or any court of law and cannot be held responsible for any different interpretations of laws that may be taken by such bodies in the future. Gaming and gambling are state specific subjects and the analysis with respect to each may change in the event any contrary legislation is passed or a court of law pronounces a different view in any case;
- (iv) This Legal Opinion is rendered on the basis of Indian laws and regulations existing as on date of issuance of the Legal Opinion. Any changes in Indian law after the date mentioned herein, which are retrospective, could have an effect on the validity of the conclusions stated herein;
- (v) We do not express any opinion herein as to, nor have we investigated for the purposes of this Legal Opinion, the laws of any jurisdiction other than India;
- (vi) A certificate, determination, notification, opinion, or the like will not be binding on an Indian court which would have to be independently satisfied on the contents thereof for the purposes of enforcement;
- (vii) Our responses in this Legal Opinion are limited to the queries raised for our consideration and as specified in paragraph 2 above, and should not be construed to cover opinions on all other requirements which are required to be complied with by the addressee;
- (viii) Our liability (including the liability, if any, of our partners, associates or employees) shall be limited to professional fees received by us for rendering this Legal Opinion; and
- (ix) This Legal Opinion is governed by, and shall be construed in accordance with, Indian law.





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- (x) This Legal Opinion is given and addressed in confidence to, and is for the sole benefit of the addressee and may be relied on only by the addressee. This Legal Opinion is not to be disclosed to any other person except with our prior written consent. This Legal Opinion is not to be relied upon by the addressee for any purpose other than in relation to the queries set out herein, and for any purpose by any other person. The delivery of this Legal Opinion either by ourselves, or otherwise to any person, including by any such person shall not make such person or any such person a client of our firm, and such person shall not be deemed to have received legal advice from our firm. In any event, we shall assume no liability whatsoever in relation to any disclosures and/or the contents of this Legal Opinion towards any person other than the addressee, if such person is not being entitled to rely upon this Legal Opinion.

If you require any clarifications in relation to the above, please do not hesitate to contact us.

For and on behalf of

Gauhar Mirza
Partner

Enrollment No. : D/4139/2010

