

**Kayser Kamal**  
Barrister-at-Law of Lincoln's Inn  
Advocate  
Supreme Court of Bangladesh

**M. Afshar Uddin**  
Barrister-at-Law of Lincoln's Inn  
Advocate  
Supreme Court of Bangladesh

**Faijan Dibrat**  
Barrister-at-Law of Lincoln's Inn  
Advocate  
Supreme Court of Bangladesh



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**LEGAL NOTICE**  
**(Registered with A/D)**

Date: 22 August, 2024  
Ref: Matrix/KK/2024/LN-06

To,

- Helal Khan,**  
Address: House No. 44, Road No. 02,  
  
Block #B, Niketon, Gulshan.
- Safar Raj Anowar**  
Address: 70 Park Road,  
  
Baridhara, Gulshan.  
  
Phone: 01911353663
- Bangladesh Film Director Association (BFDA)**  
represented by General Secretary,  
C/O Bangladesh Film Development Corporation (BFDC),  
Tejgaon, Dhaka-1208

..... Notice Receivers

**From:**  
**Kayser Kamal**  
Barrister-at-Law  
Advocate,  
Supreme Court of Bangladesh  
Room No. 110,  
Supreme Court Bar Association Building,  
Ramna, Dhaka.

.....Notice Sender

Subject: Legal Notice concerning publishing news and activities regarding releasing film namely "APOSHIN" on former Prime Minister Begum Khaleda



**Dear Sir,**

I am writing you to address you as follows:

1. That I am an Advocate of the Supreme Court of Bangladesh and a conscious citizen of the country. I am serving as the Legal Affairs Secretary of the Bangladesh Nationalist Party-BNP as well as the Secretary General of the Central Committee of Bangladesh Jatiotabadi Ainjibi Forum (BJAF), an organization of pro-BNP lawyers of different Bar Associations all over the country.
2. That, in 1945, on August 15, Begum Khaleda Zia was born. She is a well-known politician both nationally and internationally. She is the Chairperson of Bangladesh Nationalist Party (BNP). Following the victory of the BNP party in the General Election of 1991, Begum Khaleda Zia was elected as a prime minister. She also served briefly in the short-lived government in 1996. Lastly, she was elected as the Prime Minister of Bangladesh from June 2001 to October 2006. She was the first female Prime Minister of Bangladesh and second female Prime Minister in Muslim world. That, The New Jersey State Senate recognized Begum Khaleda Zia as a "**Fighter for Democracy**" on May 24, 2011. It was a first for the state Senate to honor a foreign leader in this way, and it was a reflection of the growing number of immigrants and South Asian descendants living in the state. Afterwards, on July 31, 2018, she received the "**Mother of Democracy**" award from the Canadian Human Rights International Organization (CHRIO).
3. That her husband, martyred President Ziaur Rahman is a great leader of Bangladesh. He declared the independence of Bangladesh and he fought the liberation war as the Commander of the "Z Force". In 1972, he was awarded the title "Bir Uttam" for his heroic contribution in the liberation war. Thus, martyred President Ziaur Rahman Bir Uttam is an integral part of the history of Bangladesh and without Ziaur Rahman, the history of our liberation war shall always remain incomplete. He is the founder of Bangladesh Nationalist Party-BNP, the most popular and largest political party in Bangladesh. He is not only the founder of BNP; he is the founder of multi-party democracy, one of the basic pillar of the Constitution.
4. That, there have several newspapers and electronic medias which are: the Samakal, ajkerpatrika.com, dhakapost.com, kalbela.com, the Business





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Post, The Daily Ittefaq, Dhaka Tribune Bangla, desh rupantor, banglanews24.com, ntvbd.com etc. have published several news on 21<sup>st</sup> August, 2024 that you the notice receiver nos. 1 & 2 have declared to release a film namely "**APOSHEEN**" that is arising out of the life story of three times former Prime Minister Begum Khaleda Zia. In all newspapers and electronic Medias, it has been published that the movie will be released very soon. The Notice Recipient No 1 & 2 have already produced the film that directed by late Gazi Mazharul Anwar. You also mentioned that the movie "**APOSHEEN**" is the last creation of the legendary director Gazi Mazharul Anwar, and want to release the movie for the people. You also stated that, you will be able to show the movie to the audience this year itself. Nipun Akhtar plays as "Begum Khaleda Zia" in the movie. She also hoped that, Helal Khan would release the movie soon. Moreover, Gazi Mazharul Anwar's son named, the Sarfraz Anwar Upal (notice receiver no 2) told that they have taken initiative as a family to convey all the creations of father to people.

5. That we are utterly shocked and infuriated to know, that, you the notice receiver nos. 1 & 2 are taking steps to release the flim namely "**APOSHEEN**" by adopting the life story of the former Prime Minister Begum Khaleda Zia. You are well aware of the fact that, the former Prime Minister Begum Khaleda Zia and her family members did not give any permission or consent for making the said movie "**APOSHEEN**". The entire story rights that is deriving from the real life story of former Prime Minister Begum Khaleda Zia & her family protected only by themselves. Your steps to make and release the said movie about her life is unquestionably illegal which amounts a criminal offence.
6. That it is noteworthy to mention here that **NO CONSENT WHATSOEVER** was sought from Begum Khaleda Zia or, her family members about making the film namely "**APOSHEEN**". Undoubtedly that the statement made by you the Notice Receiver Nos. 1 & 2, that you will release the movie by taking consent from Begum Khaleda Zia or her family members in respect of further editing and releasing the film are completely personal rights of Begum Khaleda Zia and her family. Moreover, without getting any prior consent from Begum Khaleda Zia, the advertising and promotion of the movie also violates the private rights. Hereby, you are committed a criminal offence.



7. You the Notice Receiver No 1 & 2 should aware that right to privacy and reputation is fundamental rights of a person, which are guaranteed under the Constitution. No one shall be subjected to arbitrary interference with his privacy, family, nor to attacks upon his honour and reputation. Your activities clearly infringes the right of privacy and reputation, which is unlawful and prohibited.
8. That further, you the notice receiver No 1 & 2 should aware that, your activity clearly constitutes criminal activities which are punishable under the **Bangladesh Penal Code, 1860**, as well as under the **Cyber Security Act, 2023**.
9. If you denied to debarred yourself from such kind of activities or take any further steps about making or further editing the film I shall be constrained to file criminal cases against you under the relevant sections of the Penal Code, 1860 and the Cyber Security Act, 2023.
10. That in view of the aforementioned statements, I strongly condemn the statements you the notice receiver nos. 1 & 2 have made published in various newspaper and hereby demand the following actions to be taken within 5 (Five) days from the receipt of this notice:
  - (a) A public apology to all individuals offended or impacted by your comment in Electronic, Print and social media for distorting image of former Prime Minister Khaleda Zia and her family members.
  - (b) This apology should be provided in the same manner and platforms used to make the original comment (that is in all the newspaper and social media published the news about making films).
  - (c) An assurance that you will refrain from engaging yourself from making false statement and the film based on former Prime Minister Begum Khaleda Zia.

In the premises mentioned hereinabove, you notice recipient no 1 & 2 are requested to take necessary to fulfilled the demand as asked in paragraph 10 and If you fail to comply with the said demand within 5 (five) days, appropriate legal





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action both criminal and civil shall be taken against you. The risk, responsibility and consequence of such legal action shall be vested entirely upon you.

**PLEASE DO NOT IGNORE THIS LEGAL NOTICE, as no further notice(s) shall be served upon you prior to filing the aforementioned cases against you should you fail to act in accordance with the above mentioned instructions within 5 (five) days of the receipt of this notice, which may result in warrant of arrest being issued against you.**

N.B.: A copy of this notice is kept in our Chamber for further use reference only.

Sincerely yours,

**(Barrister Kayser Kamal)**  
Advocate, Supreme Court of Bangladesh

22.08.2024

**Kayser Kamal**  
Barrister-at-Law of Lincoln's Inn  
Advocate  
Supreme Court of Bangladesh

**Copy for kind information and Necessary action :**

01. Managing Director, Bangladesh Film Development Corporation (BFDC),  
Tejgaon, Dhaka-1208
02. Secretary, Ministry of Cultural Affairs, Building No. 6, 10th Floor, Bangladesh  
Secretariat, Dhaka-1000, Bangladesh.
03. Chairman, Bangladesh Film Censor Board (BFCCB), 112 Circuit House Rd,  
Dhaka 1000
04. Inspector General, Bangladesh Police, Police Headquarters, 6 Phoenix Road,  
Fulbaria, Dhaka
05. Commissioner, Dhaka Metropolitan Police (DMP), 36 Minto Road, Dhaka.