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11 Life Bliss Foundation, and
12 Nithyananda Dhyanapectam
13 Temple & Cultural Center

14 **UNITED STATES DISTRICT COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA**

16 LIFE BLISS FOUNDATION, a California
17 Non-Profit Corporation; and
18 NITHYANANDA DHYANAPEETAM
19 TEMPLE & CULTURAL CENTER, a
20 California Non-Profit Corporation,

21 Plaintiffs,

22 v.

23 SUN TV NETWORK LIMITED, an Indian
24 company; NAKKHEERAN PUBLICATIONS,
25 an Indian company; KALANITHI MARAN,
26 an individual; DHARMARAJA HANSRAJ
27 SAXENA, an individual; RAMADOS
28 AYYAPPAN, an individual; V. RAJA, an
individual; S. KANNAN, an individual; R. M.
R. RAMESH, an individual; RAMANATHAN
GOPAL, an individual; ANNAMALAI
KAMARAJ, an individual; NITHYA
DHARMANANDA, a.k.a. LENIN
KARUPPANNAN, an individual; MOORTHI
SHREEDHAR, an individual;
KARUPPANNAN KUMAR, an individual;
GIRIDHAR LAL PRASAN KUMAR, an
individual; AARTHI RAO, an individual;
MANICKAM NARAYANAN, an individual;
and DOES 1 through 10, inclusive,

Defendants.

**CASE NO. 5:13-cv-00393-VAP
(SPx)**

[Assigned to the Honorable Virginia
A. Phillips, District Judge, and the
Honorable Sheri Pym, Magistrate
Judge]

**DECLARATION OF
DHARMARAJA HANSRAJ
SAXENA**

DECLARATION OF DHARMARAJA HANSRAJ SAXENA

I, Dharmaraja Hansraj Saxena, declare and state as follows:

1. I have personal knowledge of all of the facts contained in this declaration and, if called as a witness, I could and would competently testify to all of said facts.

2. I deny any wrongdoing in this case.

3. I was a corporate officer of Sun TV Network Limited (“Sun TV”) from 2009 to 2011. I was the Chief Operating Officer of Sun Pictures, a division of Sun TV. I was an employee of Sun TV from 1994.

4. As a corporate officer of Sun TV Network Limited, I had high-level discussions with the other corporate officers of Sun TV and the members of the Board of Directors of Sun TV. I was highly familiar with the operations of Sun TV in general, not just the film division, which I headed.

5. In March of 2010, V. Raja was the head content editor of Sun TV’s news programming. S. Kannan was the Chief Technical Officer. R.M.R. Ramesh was the head of Kal Publications, which was effectively part of Sun TV and effectively owned by Sun TV.

6. As of March 2010, I had personal knowledge from my working at Sun TV that V. Raja, S. Kannan, and R.M.R. Ramesh had a routine practice of using the broadcasting of false news stories and true stories that have fabrications added to extort money from individuals and organizations. This happened at least seven times, likely more. These three individuals would use associates to have much of the direct contact with the victims.

7. Prior to March of 2010, I shared information with Kalanithi Maran that there are specific complaints about these people V. Raja, S. Kannan, and R.M.R. Ramesh on extortion activity. And Kalanithi Maran also indicated to me that he heard and received complaints on specific incidents and he condoned it.

8. A board meeting which comprised of Kalanithi Maran , S.Kannan ,

1 R.M.Ramesh and V.Raja took the decision of broadcasting of the video at issue in
2 this case. I was in Dubai when this meeting happened. I was not part of this decision.

3 9. In March of 2010, it was common knowledge at Sun TV that Sun TV
4 broadcasted the Sun TV channel in the United States. It was common knowledge
5 within Sun TV that whatever aired on the Sun TV channel in India was also
6 broadcasted automatically in the United States. Kannan was in charge of ensuring
7 that content sent abroad complied with those countries' laws.

8 10. Sun TV was the first network in India to broadcast the Video at issue in
9 this case.

10 I declare under penalty of perjury pursuant to the laws of the State of California
11 and the United States of America that the foregoing is true and correct to the best of
12 my knowledge.

13 Executed on November 3, 2014 in Chennai, India.



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15 Dharmaraja Hansraj Saxena
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