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24th September 2025

The Director of Public Prosecutions

Gunu House

25 Gladstone Road

Suva,

**Dear Sir/Madam,**

Re:  **Proposed Agreed Facts for State v Shazeel Zoher Hasan & Shymal Kumar**

 **[Criminal Case No. 1590 of 2022- Nasinu Magistrate Court]**

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We refer to the above matter. The proposed agreed facts were served on us in Court on 29 July 2025 by one of your Counsel.

We confirm that we represent both accused persons in this matter. Enclosed herewith are the proposed agreed facts for your reference. Kindly note that we are also proposing alternate agreed facts derived from the disclosures.

Further, we have no objection to the prosecution’s listed exhibits being made available and confirm our agreement to the statements identified by the prosecution as available for cross-examination. We would appreciate it if Counsel in carriage could send an email to the addresses mentioned above.

We look forward to your confirmation of the agreed position.

Yours Faithfully,

**KARUNARATNE LAWYERS**

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