

ASHWIN KOTHARI

Flat No 4, Gold Cornet, First Floor 11 Navrojee Gamadia Road, Mumbai 400026

February 8, 2018

To
The Board of Directors
Saraswati Commercial (India) Limited
209/210, Arcadia Building, 2nd Floor,
Plot No. 195, Nariman Point,
Mumbai – 400021.

To
Corporate Relationship Department
BSE Limited
P. J. Towers, 1st Floor,
Dalal Street,
Mumbai - 400 023

Sub: Disclosure under regulation 29(2) of SEBI (Substantial Acquisition of shares and Takeovers) Regulation, 2011.

With reference to the captioned subject, enclosed herewith please find the disclosure as required under regulation 29(2) of SEBI (Substantial Acquisition of shares and Takeovers) Regulation, 2011 by the promoters of Saraswati Commercial (India) Limited.

Kindly take the same on your record and oblige.

Thanking You,

Yours faithfully



ASHWIN KOTHARI
AUTHORISED SIGNATORY

Encl.: As above.

Format for disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

Name of the Target Company (TC)	Saraswati Commercial (India) Limited		
Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	<ol style="list-style-type: none"> 1. Ashwin Kothari 2. Rohit Kothari 3. Meena Kothari 4. Ashwin Kumar Kothari (s) (HUF) 5. Ashwin Kumar Kothari (HUF) 6. Pannalal C. Kothari (HUF) 7. Harisingh Shyamsukha 8. Niyati Mehta 9. GeeCee Investments Limited 10. Winro Commercial (India) Limited 11. Sam-Jag-Deep Investments Private Limited 12. Four Dimensions Securities (India) Limited 13. Four Dimensions Commodities Private Limited 		
Whether the acquirer belongs to Promoter/Promoter group	Yes		
Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited		
Details of the acquisition / disposal as follows	Number	% w.r.t. total share/voting capital wherever applicable (*)	% w.r.t. total diluted share/voting capital of the TC (**)
Before the acquisition/disposal under consideration, holding of :			
a) Shares carrying voting rights			
- Ashwin Kothari	64,849	6.29	6.29
- Rohit Kothari	44,742	4.34	4.34
- Meena Kothari	20,540	1.99	1.99
- Ashwin Kumar Kothari (s) (HUF)	63,029	6.12	6.12
- Ashwin Kumar Kothari (HUF)	63,006	6.11	6.11
- Pannalal C. Kothari (HUF)	54125	5.25	5.25

- Harisingh Shyamsukha	11	0.00	0.00
- Niyati Mehta	22000	2.13	2.13
- GeeCee Investments Limited	7861	0.76	0.76
- Winro Commercial (India) Limited	177584	17.23	17.23
- Sam-Jag-Deep Investments Private Limited	1,450	0.14	0.14
- Four Dimensions Securities (India) Limited	205787	19.97	19.97
- Four Dimensions Commodities Private Limited	31,000	3.01	3.01
b) Shares in the nature of encumbrance (pledge/lien/non-disposal undertaking/ others)	NA	NA	NA
c) Voting rights (VR) otherwise than by equity shares	NA	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category)	NA	NA	NA
e) Total (a+b+c+d)	755984	73.35	73.35
Details of acquisition/sale			
a) Shares carrying voting rights acquired/sold			
- Ashwin Kothari	3768	0.37	0.37
- Rohit Kothari	2601	0.25	0.25
- Meena Kothari	1193	0.12	0.12
- Ashwin Kumar Kothari (s) (HUF)	3663	0.36	0.36
- Ashwin Kumar Kothari (HUF)	3663	0.36	0.36
- Pannalal C. Kothari (HUF)	3146	0.31	0.31
- Harisingh Shyamsukha	0	0.00	0.00
- Niyati Mehta	0	0.00	0.00
- GeeCee Investments Limited	0	0.00	0.00
- Winro Commercial (India) Limited	0	0.00	0.00
- Sam-Jag-Deep Investments Private Limited	0	0.00	0.00
- Four Dimensions Securities (India) Limited	0	0.00	0.00
- Four Dimensions Commodities Private Limited	0	0.00	0.00
b) VRs acquired /sold otherwise than by shares	NA	NA	NA
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) acquired/sold	NA	NA	NA
d) Shares encumbered / invoked/released by the acquirer.	NA	NA	NA
Total (a+b+c+/-d)	18034	1.75	1.75

After the acquisition/sale, holding of:			
a) Shares carrying voting rights			
- Ashwin Kothari	61081	6.10	6.10
- Rohit Kothari	42141	4.21	4.21
- Meena Kothari	19347	1.93	1.93
- Ashwin Kumar Kothari (s) (HUF)	59366	5.93	5.93
- Ashwin Kumar Kothari (HUF)	59343	5.93	5.93
- Pannalal C. Kothari (HUF)	50979	5.09	5.09
- Harisingh Shyamsukha	11	0.00	0.00
- Niyati Mehta	22000	2.20	2.20
- GeeCee Investments Limited	7861	0.79	0.79
- Winro Commercial (India) Limited	177584	17.74	17.74
- Sam-Jag-Deep Investments Private Limited	1450	0.14	0.14
- Four Dimensions Securities (India) Limited	205787	20.56	20.56
- Four Dimensions Commodities Private Limited	31000	3.10	3.10
b) Shares encumbered with the acquirer	NA	NA	NA
c) VRs otherwise than by equity shares	NA	NA	NA
d) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the TC (specify holding in each category) after acquisition	NA	NA	NA
		<i>(Refer note 1)</i>	<i>(Refer note 1)</i>
Total (a+b+c+d)	737950	73.73	73.73
Mode of acquisition/sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc.)	Pursuant to disposal of shares under Buyback of Equity Shares of the Company		
Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	07.02.2018		
Equity share capital / total voting capital of the TC before the said acquisition/sale	Rs. 1,03,05,930/- comprising 10,30,593 equity shares of Rs. 10/- per equity share.		
Equity share capital/ total voting capital of the TC after the said acquisition/sale	Rs.1,00,09,280/- comprising 10,00,928 equity shares of Rs. 10/- per equity share.		
Total diluted share/voting capital of the TC after the said acquisition/sale	Rs. 2,96,650/- comprising 29,665 equity shares of Rs. 10/- per equity share.		

Note 1: This filing is being made on account of disposal of securities through Buyback under tender offer. The Effective Date of the settlement is 07.02.2018. The percentage of total share/voting capital is calculated after taking into consideration the paid up capital of the company post Buyback of Securities.

Note:

(*) Total share capital/ voting capital to be taken as per the latest filing done by the company to the Stock Exchange under regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

(**) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Ashwin Kothari



Place: Mumbai

Date: 08.02.2018

Rohit Kothari



Place: Mumbai

Date: 08.02.2018

Meena Kothari

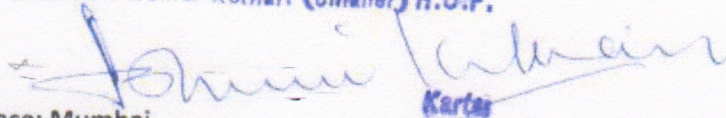


Place: Mumbai

Date: 08.02.2018

For and behalf Ashwin Kumar Kothari (s) (HUF)

for Ashwin Kumar Kothari (Smaller) H.U.P.

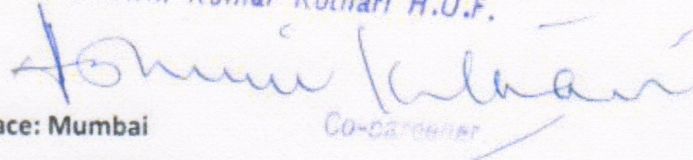

Karta

Place: Mumbai

Date: 08.02.2018

For and behalf Ashwin Kumar Kothari (HUF)

for Ashwin Kumar Kothari H.U.F.

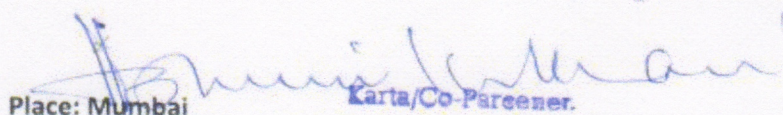

CO-PARTNER

Place: Mumbai

Date: 08.02.2018

For and behalf -Pannalal C. Kothari (HUF)

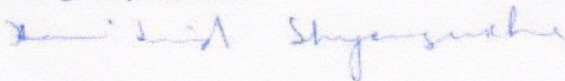
for PANNALAL C. KOTHARI (H.U.F.)


Karta/Co-Partner.

Place: Mumbai

Date: 08.02.2018

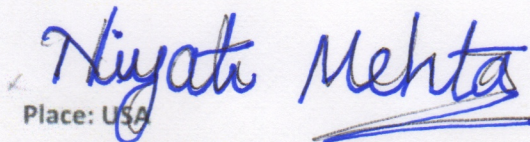
Harisingh Shyamsukha



Place: Mumbai

Date: 08.02.2018

Niyati Mehta



Place: USA

Date: 08.02.2018

For and behalf GeeCee Investments Limited
FOR GEECEE INVESTMENTS LTD.


DIRECTOR/AUTHORISED SIGNATORY
Place: Mumbai
Date: 08.02.2018

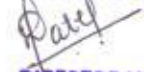
For and behalf Winro Commercial (India) Limited
FOR WINRO COMMERCIAL (INDIA) LTD.


COMPANY SECRETARY
Place: Mumbai
Date: 08.02.2018

For and behalf Sam-Jag-Deep Investments Private Limited
FOR SAM-JAG-DEEP INVESTMENTS PVT. LTD


DIRECTOR/AUTHORISED SIGNATORY
Place: Mumbai
Date: 08.02.2018

For and behalf Four Dimensions Securities (India) Limited
FOR FOUR DIMENSIONS SECURITIES (INDIA) LTD


DIRECTOR/AUTHORISED SIGNATORY
Place: Mumbai
Date: 08.02.2018

For and behalf Four Dimensions Commodities Private Limited
FOR FOUR DIMENSIONS COMMODITIES PVT. LTD.


DIRECTOR/AUTHORISED SIGNATORY
Place: Mumbai
Date: 08.02.2018