

*BEFORE CONSUMER DISPUTES REDRESSAL FORUM, ERNAKULAM*

*C.C.No. 246/08 of 2008*

**COMPLAINANT**

Koshy John (Age: 21)

*[address removed]*

**OPPOSITE PARTY/PARTIES**

- 1) Hewlett-Packard India Pvt. Ltd.

HP Compaq Head Office

24 Salarpuria,

Arena Building,

Hosur Main Road,

Adegudi,

Bangalore – 560 030

- 2) HP Service Center

Ground Floor,

Colton House,

Bank Road,

Opp. St. Antony's Church,

Kaloor,

Cochin – 682 017

*(Laptop servicing division of:*

Nortech House,

Arackakadavu Road,

Edappally,

Ernakulam - 680 024)

## PARTICULARS OF COMPLAINT

The following are the charges being leveled against Hewlett Packard India Pvt. Ltd. and their authorized service center at Ernakulam:

1. Refusal to repair an expensive 17" laptop for **6 months** despite the problems being known defects in the series – no alternatives like shipping to a location where it would be fixed was even entertained (expensive high-end notebook with **inherent defects**).
2. Keeping the notebook in their custody for **3 months** (on three consecutive instances attempting to fix the same problems) after the 6 month period of non-performance.
3. **Being uncooperative** during the repair process trying to brush aside real concerns aggressively when they were unable to fix the problem using a particular method in the second repair attempt (being knowledgeable about computers I was able to conclusively prove that the problem was really not resolved – but only with great effort and strain).
4. Replacing the most expensive and most important component of the system (the main system board, also referred to herein as the motherboard) with one of an **inferior** configuration (after having replaced it **many times** already – thereby making the system eligible for complete replacement due to **recurring failure**).
5. Indulging in **fraudulent behavior** and attempting to cover it up by being deliberately ambiguous about the last repairs that they conducted (replacing the system board in a way that most average customers would not even notice and not acknowledging the same until being pointedly and repeatedly questioned – evidence of this is available in writing due to remarkable foresight).
6. **Causing significant cosmetic damage** to the laptop during the multiple repair attempts including deep scratches even on newly replaced parts and a **badly assembled** (or inherently warped) keyboard module among other things.
7. Refusing to accept the reasonable request of replacing the laptop considering the overall experience (DESPITE it being a HP policy to do so). But even this wasn't communicated explicitly (I was told that my request was being processed) – over **26 calls** to customer care over a period of more than a month and getting only **empty promises** even after a series of case escalations led me to arrive at that conclusion.
8. **Acting in bad faith** on multiple occasions (some listed above) – even refusing to properly consider my problem (by pretending to do their best) until the National Consumer Forum was contacted. And even after that the settlement offers made were **woefully inadequate** and unworthy of consideration.
9. Causing significant **emotional distress and inconveniences** over an unacceptably extended period of time (**well in excess of 10 months**) by acting in bad faith.

## DETAILS

The Hewlett-Packard dv9295ea notebook PC under consideration was purchased from Dubai on April 5, 2007 for AED 7600 (equivalent to Rs.96,000 at that time). The details of the system are as follows:

Serial number: CNF7082NDR

Product number: RY700EA#ABV

The exact configuration of the laptop as printed on the container that it shipped in is presented as **attachment 1**.

The laptop had the best possible specifications sold by HP internationally at the time of purchase which accounted for its high retail price. The said notebook/laptop shipped with 1 year **Worldwide Limited Warranty and Technical Support** which even states that *“In the unlikely event that your HP product has a **recurring failure**, HP, at its discretion, may elect to provide you with a **replacement unit** of HP’s choosing that is at least equivalent to your HP branded product in hardware performance. HP reserves the right to elect, at its sole discretion, to give you a **refund** of your purchase price or lease payments (less interest) instead of a replacement”*.

The laptop developed multiple problems (including overheating, battery failing to charge and cracking of the display assembly – things that were occurring on a large scale globally to this series of laptops) in September 2007 that effectively made it useless. HP refused to fix it for 6 months. Then when they finally took it in, it took 3 months and even then the repair was of a totally unacceptable level. Fraudulent behavior was noted towards the end of the repair process and hence, instead of proceeding down that road further, HP Customer Care was called and a replacement was requested for in light of the above. Even after 26+ calls over a duration of more than a month, all that materialized was a series of escalations and a massive number of broken promises for a call back. Mails to the HP India President and HP’s worldwide CEO and President achieved nothing tangible. The National consumer forum was approached after coming to the conclusion that HP was acting in bad faith.

See **attachment 2** for quotes from the lengthy warranty enhancement program applicable to a number of sub-models of the dv9000 series of laptops. See **attachment 3** for documentation of users who faced display assembly design defects (HP publicly has not acknowledged the problem but does repair the parts damaged for free ONLY if the user appears to be aware that it is in fact a design defect and refuses to pay for repairs – *widely documented malafide*

*behavior on HP's part*). There is also widespread documentation of overheating problems with the dv9000 laptop series on the internet (cannot be presented as printed evidence due to the enormity of the documentation available).

The service history of the laptop detailing experiences with HP Customer Care and the local service center (NORTECH) are listed below.

## Service History

### **0. September, 2007 to February 18<sup>th</sup>, 2008 = 6 months**

*Complaints: Display assembly design defect causing screen to crack open, Battery not charging, repeated thermal shutdown on overheating.*

I had a live chat with HP Customer Care (United States) who recommended me calling HP India. I called the numbers given to me and the service center executive flatly told me that HP would not be supporting the dv9000 series laptops in India. This was of no use to me and **I had to suffer the stated problems for an overwhelming 6 months. The laptop would cutoff due to overheating several times a day in 5 second to 5 minute intervals.**

HP did not offer to ship the laptop to a country where the model could be fixed despite the fact the problems were inherent defects and the fact that a huge premium was paid to get hold of the best system they had on offer.

Eventually when I came to know that HP had started selling the dv9000t series in India, I called up customer care again (in February 2008) and when they agreed to take it in, I gave it in to the local HP service center: Nortech.

Original motherboard: **RY700EA#ABV**

### **1. February 18<sup>th</sup> to March 20<sup>th</sup>, 2008 = 5 weeks (call regn. no.: 13398)**

*Complaints: Display assembly design defect causing screen to crack open, Battery not charging, repeated thermal shutdown on overheating.*

WEEK 1: Diagnosing the laptop. (*response of service center when I called*)

WEEK 2: Ordered new hinges and motherboard **[RY700EA#ABB]**.

WEEK 3: Replaced hinge - *failed* coz of additional damage found on display bezel. Ordered a whole new display assembly complete with a new LCD. Motherboard arrives and is replaced.

WEEK 4: New display arrives and is replaced. Thermal cut off diagnosed as caused by faulty cables. Ordered new cables.

WEEK 5: New cables arrive and laptop returned on March 20<sup>th</sup>

**Overheating** issue noted immediately but kept under observation by me a few more days since the service center had closed for Easter weekend. Display assembly **central bush missing** on new display. Scratch on notebook base identified - inconsequential to me and I let it go.

## **2. March 26<sup>th</sup> to April 17<sup>th</sup>, 2008 = 3 weeks (call regn. no.: 14326)**

*Complaints: Overheating, thermal shutdown on restarting, display bush missing, shortened battery life.*

WEEK 1: Diagnosing the laptop – Motherboard replacement ordered [**RY700EA#ABV this time BIOS: F.2B**].

WEEK 3: Replaced and return date set to April 16<sup>th</sup>, 2008

**ALL problems reported before handing over were found not to be rectified (AFTER being declared as working perfectly by the service center quality control section).** Kept overnight for observation by HP – problem reported back to me as a software issue. **After over 1 hour of sitting at the service center and discussing patiently**, they agreed there was indeed a hardware problem (but not after they did a recovery to factory defaults – causing me to lose all my custom settings and files).

## **3. April 18<sup>th</sup> to May 07<sup>th</sup>, 2008 = 3 weeks (call regn. no.: 14663)**

*Complaints (same as before): Overheating, thermal shutdown on restarting, display bush missing, shortened battery life + **Keyboard keys not working***

WEEK 1: Ordered new processor and heatsink. Keyboard replacement ordered after I was made to visit the service center again with a copy of my purchase receipt.

WEEK 3: **I was told** that ONLY *the processor, heatsink and keyboard were replaced.*

## **FRAUD**

*May 7th, 2008: But I found* that the motherboard number had changed to something ending in **#ABA and BIOS: F.16**. I asked the frontend employee if there was a change of motherboard. **They said no.** I asked them to ask a service engineer. **They said no.** Closer inspection of the notebook revealed further cosmetic damage and lots of accumulated dust on the “new” heat-sink fan (much more than the dust accumulated on the older fan over a period of 9 months).

I took the laptop home and there I found that a **screw missing** and that an **USB port was not working (these were not caught by the in-house quality control)**. I took it back on the same day and they were very apologetic and told me they would check it and get back to me.

*May 8th, 2008:* The next day they told me there was a loose connection and that's why the USB port was not working. I questioned them pointedly asking how the motherboard number could change if it was not replaced. The service engineer went off the phone for some time and **finally admitted to me that the motherboard had in fact been replaced.**

Later that day I went to pick it up and took the laptop home. I found that the motherboard had been replaced from the **#ABA version to RY700EA #ABV**. And I also found later that the motherboard had only 256MB dedicated graphics as opposed to 512 MB dedicated graphics which is my configuration. Additionally, the new keyboard seems to **warped** on one side and the keys are not even on the left side (possibly shoddy assembly - remember the missing screw). Sometimes the display assembly lock gets stuck leading to a **rattling noise** while typing (has to be manually released then).

**On having gone through a 3 month period of the service center trying to repair the laptop (with each repair attempt taking at least 3 weeks), AND after finding that the employees there were not being honest about the repair process, I contacted HP Customer Care India asking them to replace the laptop.**

The following is a detailed summary of my experiences with HP Customer Care's telephonic support (documented on a day to day basis at <http://www.koshyjohn.com/hp/6phone.html>).

### Detailed Telephone Support History (from May 2008 to June 2008)

The problems that I had faced, and all developments were posted on my web-site, **on a day to day basis**, for three reasons:

- (a) for all hierarchical levels of HP to whom I have communicated on the matter, to quickly find details and understand the matter and to take quick decisions
- (b) to document the matter in a honest manner, for all to see, because I have nothing to hide.
- (c) for all visitors to my web site to offer practical advice on how to solve the matter.

Days on which calls were made:

May 2008 → [9](#) | [10](#) | [13](#) | [14](#) | [17](#) | [20](#) | [21](#) | [22](#) | [23](#) | [24](#) | [29](#) | [30](#) | [31](#)    June → [6](#) | [10](#) | [19](#)

1. Laptop returned on May 8th, 2008 with **incorrect motherboard configuration** (256MB dedicated graphics as opposed to the original 512MB dedicated). (Suspicious behavior by service center on 7th and 8th of May - suspected **FRAUD**) - case id: **2600661131**

2. Called up HP Customer Care India on 9th May, 2008 and talked to a rep name Rajini (if I heard it right) who added my request for replacement to my latest case id and gave me an e-mail address to write to start the process of replacement. I was promised a reply within 24hours.

3. Escalated case further on **May 10th, 2008** and was given the escalation id of **CCHSAP141557** after e-mail to department responsible for replacements was not replied to. Waiting to hear back from HP on the complaint lodged for over 72 hours.....

4. Called HP CC on **May 13th, 2008** - call forwarded twice until I reached a technical support representative named Pawan (the first helpful person so far in the past couple of days). After explaining my circumstances in depth along with the details of this site, I was told that a **replacement request was forwarded to HP's Bangalore office** and I would be hearing from them within 72 hours. In any case, Mr.Pawan would be calling me back in 24 hours to see if I've received any call from the Bangalore office.

5. Called HP CC on May 14th, 2008 after Pawan never called. By some strange twist, I happened to get connected to him again. He checked told me he will request an update on the situation and told me to wait for the 72 hours to complete.

6. Called HP CC on May 17th, 2008 - again by amazing coincidence, I got connected to Pawan again who apologized for the delay and told me the request would be flagged and HP would definitely get back to me in a day or two.

7. Called HP CC on May 20th, 2008 - the call that was promised never materialized. Talked to someone named Sanjay who told me that HP was processing the request and the status had been set to them planning to call me directly on May 21st, 2008.

8. Called HP CC on May 21st, 2008 - the call that was promised never materialized. The status had been set to them planning to call me directly on May 22nd, 2008.

9. Called HP CC on May 22nd, 2008 - the call that was promised never materialized. Talked to someone named Shikha who told me that she has placed a complaint with the concerned department and I would hear from HP within 24 hours.

**[MAIL TO HP INDIA'S PRESIDENT - BALU DORAISAMY \(22nd May, 2008\)](#)**

**LISTED AS ATTACHMENT 4**

10. Called HP CC on May 23rd, 2008 - the call that was promised never materialized. What a surprise. Talked to someone named Tarun who told me that this is an extremely long delay and that he's terribly sorry. They were unable to get in touch with their Bangalore department by phone and he told his supervisor about the situation who promptly started composing a mail to

the department (well that's what he told me). And he said he couldn't promise a response within a given time frame since the escalation/replacements department was not directly connected to theirs.

11. Called HP CC **7 times** on **May 24th, 2008** - Explained my problem over and over 7 times because the call center system *cut me off at exactly 10 minutes into the call every time (seemed to be deliberately preprogrammed that way)*.

Anyway, the second last person I talked to told me my problem has notified to a higher department and that I would get a *call back in about half an hour*. And obviously, I didn't get it. No surprise there. So called again, this time I was immediately forwarded to a **Upendra Kumar** (I hope I'm spelling all the HP employee names right) - through the course of the conversation I learnt that he was the **case manager** assigned to me and he would be handling my case from this point on to resolution. He sounded far more professional and asked me to explain the details of my case; I now have a flicker of hope that HP might not just yet drive me to a consumer forum. I was told that he would try to get the department to get back to me on Monday (26th May) and he would mail me in the morning to inform me what time I would get the call.

12. Called HP CC on May 29th, 2008 - I never heard back from Upendra Kumar and I got no communication from HP whatsoever. So I waited a while and called up 5 days after the last and asked to speak to my case manager. The person on the line said there were a lot of employees around and she's unable to locate him. So I gave her my escalation id and I was told that according to the information was available to her, HP was scheduled to call me tomorrow. Let's see if that's going to happen. I'm really not counting on it considering I've called like 18 times without ever getting a call back.

13. Called HP CC on May 30th, 2008 - I called and provided the details of my case again since I never got the call back. The call center employee told me that since the complaint has been forwarded he was helpless to do anything further. I asked to speak to his supervisor and was told they would call me back in 15 minutes. That never happened.

14. Called HP CC **3 times** on May 31st, 2008 - Talked to a person named Thanu who told me she'll try to connect me to Upendra Kumar. She went off the line for a while and then told me that Upendra Kumar was in a meeting and *he would get back to me later in the day*. She told me that the complaint id was registered in the name of a **Mr. Manish**. Who the hell is Mr. Manish? I'm Koshy John. Also the system's serial number was listed as **CNF7082NRD** instead of **CNF7082NDR** - all the other information was correct. I called again late in the day after it



became apparent that my case manager was not going to call me. Talked to Neha who told me that another query has been sent to the Bangalore office from her end and Mr. Upendra Kumar would call me back on Monday as he had gone out on official business. Ms. Neha also promised to call me back herself on Monday in this regard.

15. Called HP CC on **June 6th, 2008** - Of course, no-one called!!! This time: talked to a person named Priya who connected me to Mr.Upendra Kumar who said he had gone outstation on company business and that's why he was unable to get back to me two weeks back. And he was busy after that. Ok.... Well he seemed surprised that I hadn't gotten a call yet and he told me that he was going to write to the Bangalore office and the Asia-Pacific head office in **Singapore**. According to the escalation id status, I am supposed to get a call tomorrow but I told him point-blank that I had no faith in that. He seemed to understand and told me that I would definitely get some form of communication within 2 days. Yeah right.

16. Called HP CC **2 times** on June 10th, 2008 - AGAIN, no-one called! Talked to a person named Azam who sounded really uninterested and distracted. He just went on and on about why I wanted to get the laptop replaced. He said he didn't know my case manager personally and therefore could not connect me to him. Total waste of time. Called again and got connected to a Vijay who said my case manager was unavailable and when I asked again, he notified his supervisor who sent a memo to Upendra Kumar to call me back.

**[MAIL TO HP'S CEO & PRESIDENT - MARK HURD \(10th June, 2008\) & REPLY](#)**

**LISTED AS ATTACHMENT 5**

17. Called HP CC on June 19th, 2008 – I got the same response and I was asked to explain my problem all over again as though I had never called HP Customer Care before.

### **Summary of Telephone Support**

1. Called up HP Customer Care India on 9th May, 2008
2. Escalated case further on May 10th, 2008 and was given the escalation id of **CCHSAP141557**
3. Called HP CC on May 13th, 2008 - I was told that a **replacement request was forwarded to HP's Bangalore office.**
4. Called HP CC on May [14th, 17th, 20th, 21st, 22nd, 23rd] 2008 - all because the promised deadlines were not met repeatedly.
5. Called HP CC **7 times** on May 24th, 2008 - Assigned **case manager** named **Upendra Kumar**.
6. Called HP CC on May [29th,30th,31st] 2008 - Unable to get in touch with my case manager.
7. Called HP CC on June 6th, 2008 - Case forwarded to Singapore

**It became apparent that HP was just stalling and that I would never get any results this way. It was then that I called up the National Consumer Forum.**

At this point, I was convinced that HP was acting in **bad faith**. I have always been patient and reasonable throughout this nearly one year long ordeal and HP has taken advantage of that. HP has tried to even ignore my situation in the hope that I would just give up. I decided to assert my rights as a customer and demand compensation.

## Legal Timeline

**June 25th, 2008** - Contacted the National Consumer Forum. My details were noted and the details of my complaint were also taken down. I was provided with the address and telephone number of HP's Bangalore head office. I was advised to explain my problem to them and to give them a 10 day deadline to satisfactorily resolve my problem. I was told to call NCF back at the end of 10 days with the status and to proceed to litigation if I was not satisfied.

I called HP's Bangalore office at the number provided by the National Consumer Forum and the person there took my details and then put me in a conference call with a **Mr. Rakesh Handoo** from Nortech (the local HP authorized Service center). Mr. Rakesh took down my details and promised me to personally overlook my case and told me he would get back to me by 12 noon the next day.

**June 26th, 2008** - I was called by the local service center at 12:25pm and told to bring my laptop in for diagnostics. I asked the employee what he meant by "diagnostics". He refused to elaborate: only telling me it would take a couple of days. **I told him I have absolutely no intention of handing over the laptop, because they have committed fraud and it is becoming a legal case. Obviously evidence of fraud could not be handed over to the accused for tampering. Further, HP had, even after I sent e-mails to HP India's President and HP International CEO & President (Mr. Mark Hurd) and even after repeated telephone calls from my side, shown no interest whatsoever in solving my problem. It is only when I contacted the National Consumer Forum that, HP contacted me back for doing "diagnostics" on my laptop.**

Called **Mr. Rakesh** again and asked him what the status was. He asked me to list out the configuration of the notebook. I was asked to specify which parts were not of the same configuration as the original. He told me I'd need to give him a day or two for him to gather data from HP and to get a full understanding of my case. I was told that getting a replacement was a very difficult process. I told him I have no issues with that and that if HP wanted to drag its feet, I would be seeing them in court.

**June 28th, 2008** - Local service center called and offered to fix the laptop & extend the warranty. I said no - my settlement offer is fair - it's either take it or leave it.

**July 1st, 2008** - Received an e-mail from **Mr. Rakesh** to which a reply was sent. See **attachment 6**.

**July 3rd, 2008** - Received a reply from **Mr. Rakesh** - basically reiterating the offer. See **attachment 6**.

**The offer from HP is hardly fair by any standard considering what I have gone through.**

**Present status of the laptop:**

*(primary problems)*

1. Incorrect motherboard configuration – Graphics configuration is 256MB of dedicated graphics as opposed to the 512MB of the original configuration.
2. Warped keyboard assembly (uneven key layout) – defect in the replaced part or mishandling during replacement.
3. Cosmetic damages caused to the laptop caused partly by the old design defect and partly due to irresponsible handling during the multiple repair processes.

*(secondary problems)*

4. Diminished battery life due to deep discharge during the 6 month period when the battery wouldn't get charged because of faults with the system board.
5. Reduced life of hard disk drives [as implied by analysis of the drives' S.M.A.R.T. (*Self Monitoring Analysis and Reporting Technology*) characteristics data] caused by stress due to overheating and repeated cut off during the 6 month period of non-repair. See **attachment 7**.

### RELIEFS CLAIMED

A laptop like the dv9295ea which was the top of line at the time of purchase depreciate very fast – even new units at this level are sold at half their original retail cost a year after they are launched. The reason people pay around Rs.96,000 for a laptop instead of waiting a couple of months for a reduced price is to be able to harness the latest technology available. There is also the expectation of at least a decent level of customer service especially since the margins on such systems for the manufacturers are very lucrative.

The whole purpose of paying such a huge amount of money was lost when the laptop was **useless to me for more than 9 months of its 14 month life**. The level of customer care received has been bad and HP has demonstrated on numerous occasions that it is acting in bad faith.

As a customer, I have been patient and reasonable despite the inconveniences caused to me. The software programs which I develop such as DiskMax, neoSearch, etc, and which are available for downloading from my web site, and which have been so far downloaded at least a total of 25,000 times by users world over, are the publicly demonstrated and available examples of the serious nature of the requirement for a powerful laptop for me. Furthermore, I have had enquiries from USA for developing software at a price, which shows the respect that I have among users of my free software. Due to the recurring problems of the HP laptop, I could not engage in several other serious development works which otherwise I could have done had I got the laptop with all the capabilities it was originally intended to provide from day one of purchase.

I lost all trust in HP when they started trying to evade their responsibility to me. **I had reached the end of my patience after 9 months+ of not having a useful system, 8 visits to the service center, 12 part-replacements (including repeated replacement of the motherboard), fraudulent behavior on HP's part, 26+ calls to customer care and subsequent delays. And all this for a system costing Rs.96,000!**

This is not first time that HP has effectively cheated me – in May 2007, HP replaced a HP Compaq nx9010 Business Notebook's motherboard with an inferior one at a cost of around Rs.17,000 to me. I did not seek a legal avenue then because I had the "better" dv9295ea at my disposal. This is not directly connected to this case but this incident is something which has further convinced me that HP's malafide behavior with respect to my dv9295ea notebook may not be an isolated case.

**Further, of late, I have been receiving calls from around India from HP customers in similar situations asking for advice after they found my website detailing the problems I faced. I firmly believe HP is maliciously taking advantage of the reluctance of individuals to go to court for a reasonable resolution to their problems in light of the time and expense involved in pursuing a case.**

In light of the above, I am open to one of the following relief options:

#### **Option 1**

A complete refund of the purchase price of the laptop amounting to Rs.96,000 along with an additional Rs.35,000 in damages relating to the extreme inconvenience including 'opportunity loss' caused by the unavailability of the laptop, expenses involved and the valuable time exhausted in following up the case with HP. Total monetary damages: *Rs.1,31,000*. (Laptop will be handed back only on receipt of the full amount)

#### **Option 2**

Replacement with a HP laptop of at least the following configuration\* (this configuration is now sold by HP at approximately the same price at the original laptop) with 3 years of international warranty (or 2 years international + 2 years extended in a country of my choice) to be sure that HP will be standing by their product.

HP Pavilion dv7t series (successor to the dv9000t series; released in July, 2008)

##### Components

- Genuine Windows Vista Ultimate with Service Pack 1 (64-bit)
- Intel(R) Core(TM)2 Duo Processor T9400 (2.53 GHz)
- 17.0" diagonal WSXGA+ High-Definition HP BrightView Infinity Display (1680 x 1050)
- 4GB DDR2 System Memory (2 Dimm)
- 512MB NVIDIA GeForce 9600M GT
- HP Imprint Finish (Mesh)+Microphone + Webcam + Fingerprint Reader for HP BrightView Infinity Display
- Intel(R) WiFi Link 5100AGN and Bluetooth(TM)
- High speed 56K modem port
- 500GB 5400RPM SATA Dual Hard Drive (250GB x 2) with HP ProtectSmart Hard Drive Protection
- Blu-Ray ROM with SuperMulti DVD+/-R/RW Double Layer
- No TV Tuner w/remote control
- 8 Cell Lithium Ion Battery
- Norton Internet Security(TM) 2008 - 15 Month Subscription
- Microsoft(R) Works 9.0
- HP Color Matching Keyboard

##### Accessories

- HP Kensington Security Lock
- Deluxe Microfibre Cleaning Cloth

- HP Mobile Remote Control Express Card

The dv9295ea will be handed over only when I'm presented with the new laptop.

### **Option 3**

Replacement of the laptop with the following (marginally more advanced configuration with additional HP accessories) if HP is only willing to give a 1 year warranty (extendable in a country of my choice):

HP Pavilion dv7t series (successor to the dv9000t series; released in July, 2008)

#### Components

- Genuine Windows Vista Ultimate with Service Pack 1 (64-bit)
- Intel(R) Core(TM)2 Duo Processor T9600 (2.8 GHz)
- 17.0" diagonal WSXGA+ High-Definition HP BrightView Infinity Display (1680 x 1050)
- 4GB DDR2 System Memory (2 Dimm)
- 512MB NVIDIA GeForce 9600M GT
- HP Imprint Finish (Mesh)+Microphone + Webcam + Fingerprint Reader for HP BrightView Infinity Display
- Intel(R) WiFi Link 5100AGN and Bluetooth(TM)
- High speed 56K modem port
- 640GB 5400RPM SATA Dual Hard Drive (320GB x 2) with HP ProtectSmart Hard Drive Protection
- Blu-Ray ROM with SuperMulti DVD+/-R/RW Double Layer
- HP Integrated HDTV Hybrid Tuner
- Extra 8 Cell Lithium Ion Battery
- Norton Internet Security(TM) 2008 - 2 Year Subscription
- Microsoft(R) Works 9.0
- HP Color Matching Keyboard

#### Accessories

- HP Notebook Backpack
- HP Surge Protector, 11 Outlet, Phone/DSL/Coax/Network Protection
- Belkin PureAV HDMI Audio Video 8` Cable
- Targus Defcon 1 Ultra Notebook Computer Security System
- Deluxe Microfibre Cleaning Cloth
- HP Mobile Remote Control Express Card

The dv9295ea will be handed over only when I'm presented with the new laptop.

*Place:*

*Date:*

*Koshy John*

VERIFICATION

*I, \_\_\_\_\_, S/o \_\_\_\_\_ aged \_\_\_\_ years do hereby solemnly declare that the particulars stated above are true to the best of my knowledge and belief and nothing has been concealed therein. I further certify that the Annexure appended to the complaint are the true copies of original documents.*

*Verified at \_\_\_\_\_, this day \_\_\_\_\_ of \_\_\_\_\_.*

*Koshy John*