

WITNESS IS PRESENT AND DULY SWORN ON : 12.01.2026

**Chief Examination by Sri.MVD Advocate for
Petitioner:**

1. Today I have filed my affidavit in lieu of my examination in chief. The contents of the affidavit are true and correct. My Affidavit, filed in lieu of my examination in chief, has been prepared by me.

2. I have produced the Outpatient record and one X-ray film pertaining to injured person by name Neelamma Kuttappa. The said documents are marked as **Ex.P.15 and P.16** respectively.

**Cross Examination by Sri.HCB Advocate for R2 /
Insurance company :**

- 1) It is true to suggest that I have not given any treatment to the petitioner.

- 2) It is false to suggest that in the Discharge Summary the word "RTA" is not written.

- 3) It is true to suggest that after the lapse of one year 4 months after the date of accident, I have assessed the disability of the petitioner.
- 4) It is true to suggest that in Discharge Summary there is no mention about the disability.
- 5) It is true to suggest that I have not seen any documents to know that whether the petitioner had taken followup treatment or not.
- 6) It is false to suggest that at the time of discharge from the hospital, the patient was completely cured and there was no necessity for followup treatment.
- 7) It is true to suggest that at para No.2 of my Affidavit, I have narrated the complaints of the patient and the same had been written on the basis of the complaints narrated by

the petitioner. The witness volunteers that "subsequently I have clinically examined her".

- 8) It is true to suggest that the petitioner has not sustained shortening of limbs. It is false to suggest that there was no wastage of muscles.
- 9) It is false to suggest that when the petitioner never sustained any shortening of leg, the question of petitioner limping does not arise at all.
- 10) It is true to suggest that when the petitioner visited me she herself stated that she was aged about 75 years.
- 11) To some extent it is true to suggest that because of old age normally the humanbeings entertain inconvenience or difficulties while doing their day-to-day activities.
- 12) It is true to suggest that the fractured

bones of the petitioner have already been united.

13) It is false to suggest that what I have written, under the caption "mobility component" and "stability component", in my Affidavit are all imaginary.

14) It is false to suggest that only 1 / 3rd of the percentage of disability of a limb will become wholebody disability.

15) I do not know anything about the avocation of the petitioner.

16) Having regard to the age factor, and the nature of the injuries sustained by the petitioner, one can easily say and conclude that at the most the petitioner may have sustained only 8% of wholebody disability.

17) It is false to suggest that once the implants are removed from the limb of the petitioner, automatically the percentage of

her disability gets reduced.

18) It is true to suggest that I have not given any estimation about the cost of future surgery of the petitioner.

19) It is true to suggest that I have not issued any disability certificate to the petitioner nor recommended for the same.

20) It is false to suggest that the petitioner has not sustained any disability at all, **yet**, I am giving false evidence before this court.

Cross examination by R1:

R1 is exparte. Hence cross examination, by R1, is taken as nil.

(10)

SCCH – 01
MVC No.3497/2024
PW3

Re-examination : Nil.

(Computerized as per my dictation in open court)

R.O.I.&.A.C.

CHIEF JUDGE,
Court of Small Causes,
Bengaluru.