

Witness Duly Sworn On 25.05.2023

Evidence before charge .

EXAMINATION IN CHIEF : BY SHRI SSM ADVOCATE FOR
COMPLAINANT .

4. I know accused No.1 to 6 referred in the complaint.

Accused No.1 is Srinivas Tati and he was employed with us as Senior Programmer/ Analyst and his date of joining was 20th September 2010, he was promoted later as Manager- Software Development, Accused No.2 is Mr.Raghavendra Rao he was hired as technical manager and later promoted as Manager- Software Developer. and his date of joining was 1st September 2009, he was promoted later as Manager Software Development, similarly Accused No.3 is Mr.Ashok Venkataramaiah, wherein he was hired as Quality Systems manager and later promoted as Manager- Software Quality Assurance and his date of joining

was 11th August 2010, similarly Accused No.4 is Mr.Vivek Anand, wherein he was hired as Senior Programmer/Analyst and later promoted as Manager-Software Development and his date of joining was 1st April 2010,

5. During the tenure of employment of Accused No.1 to 4 they were deployed in software development, design and codification of the product and also involved in management decisions, confidentiality of the product in terms of source code, algorithms, added to this they were also involved in the resources and financial planning of the product road map.
6. Accused No.5 is Manaswini Venkitakrishnan is wife of accused No.1, accused No.6 being Ms. Vibha Kalamana Acharaya who is wife accused No.2, both accused No.5 & 6 are directors of Alopa Infotech Private Limited the competing Company established

by them,

7. Accused No.1 to 4 currently are not working in our company, in the year 2018 they had committed a fraud and breach of our non-solicit confidentiality agreement, in this context there was an internal inquiry and they failed to give us satisfactory answer to the fraud committed by them that is theft of proprietary information. Accused No.1 to 4 were involved in entire design and development of products such as Diabetes Manager, BlueStar, BlueStar Rx etc.,
8. Accused No.1 and 2 along with there spouses had established competing company in the name and style of Alopa Infotech with the same software expertise as ours. The idea was to sabotage entire operations and the development of these products in the global

market.

(Further Evidence of PW1 is deferred at the request of
learned counsel)

(Typed to my dictation in the open Court)

ROI&AC

IV ACMM