

**WITNESS – PW-1 IS RECALLED AND DULY SWORN
ON 29-01-2026.**

**Further cross Examination by Defense Counsel
Sri.M.N.N.:-**

I have produced the Board resolution -Ex.P.8 in order to show that I am the Director of the Welldoc Soft Ware Pvt. Ltd Company. It is true to suggest that there is no reference in the Ex.P.8 -Board of resolution that I have not been appointed as Director of the Welldoc Soft Ware Pvt. Ltd Company. Witness has volunteered that it is mentioned in the Ex.P.8- Board of resolution that Billy Graham is authorized to appear before the court in the legal matters as a director on behalf of the company. It is false to suggest that I have not been authorized to give evidence before the court in the Ex.P.8-Board resolution. Witness has volunteered that the company authorized to execute, sign and make representative deemed necessary and do all such other acts, deeds, matters and things as considered to expedient to give effect above resolution.

It is false to suggest that Welldoc Soft Ware Pvt. Ltd Company deliberately did not want me to give evidence before the court so it has replaced board resolution.

It is false to suggest that I have no authority to depose before the court as against the accused persons. I am not one of the share holders of the Welldoc Soft Ware Pvt. Ltd Company. Witness has volunteered that I have employee stock options in the Welldoc Soft Ware Pvt. Ltd Company.

It is true to suggest that employee stock options is contingent in nature means I have to meet certain conditions to get the employees stock options. It is false to suggest that I am neither a director nor a share holder of the Welldoc Soft Ware Pvt. Ltd Company so I have not produced any documents. Witness has volunteered that I am the director of the Welldoc Soft Ware Pvt. Ltd Company.

I have produced Ex.P.9 and 10 in order to show that Welldoc Soft Ware Pvt. Ltd Company is the developer of digital health domain.

It is true to suggest that Ex.P.9 and 10 do not contain the word digital health domain. Witness has volunteered that Ex.P.9 and 10 contain word that digital health portal.

I am not aware that what is not there in the articles of association and memorandum of association cannot be carried and it is violative of provision of the companies act-1956 and Companies act-2013.

Q:under which statute the Welldoc Soft Ware Pvt. Ltd Company was incorporated?

A: We have registered the company before registrar of company.

It is false to suggest that since I am not the director of the company I do not know under which statue Welldoc Soft Ware Pvt. Ltd got incorporated.

Q: Have you produced any documents to show that the software developed by Welldoc Soft Ware Pvt. Ltd had been patented.

A: We have patented the product but not produced the document before the court.

It is false to suggest that I am not produced the document since the product was not patented.

Q: Do you have any impediment produce the document?

A: I have to talk with management.

Q: Can you name the persons who are in management?

A: Mr.Hari Kesani is the other director of the company.

It is false to suggest that since I am not the director I have to no authority to take call to produce before the court.

Q: Since you are not the director you have to go before the management for approval for production of document?

A: It is collective decision so I have to discuss with the

other directors of the company.

Q: Can Billy Graham act only on the approval of management but not independently?

A: I can act in my individual capacity as a director of company on operational matters. I have to go before management on certain matters.

It is false to suggest that since I am not director of the company I cannot produce the documents which said to be in my custody.

It is false to suggest that since none of the product of the company patented I cannot produce the document. Products were patented in United states.

Q: Welldoc Soft Ware Pvt Ltd company cannot apply for patenting in United States?

A: Products were patented by parent company Welldoc Inc and not by Welldoc Soft Ware Pvt Ltd.

Further cross examination of PW1 is deferred as requested.

(Typed to my dictation in the open Court)

ROI & AC

IV ACJM, Bengaluru