

**WITNESS – PW-1 IS RECALLED AND DULY SWORN
ON 26-02-2026.**

**Further cross Examination by Defense Counsel
Sri.R.K:-**

It is false to suggest that no documents has been produced in order to show that Welldoc Inc gave an authority or instructions to Welldoc Software Pvt. Ltd Company to file this complaint.

Q:Whether Welldoc Inc authorized Welldoc Software Pvt. Ltd Company to file this complaint?

A: I need to verify it.

Q: whether Rian Sisko and Suzanne Clough parted away with Welldoc Software Pvt. Ltd Company are their any documents executed restraining them from using the product / software Welldoc Software Pvt. Ltd.

A: I have to get clarification from the management.

Q: Since there are no such documents you have not produced the documents before the court?

A: I need to verify it.

Q: What documents you have placed before Hon'ble Court to show that you have shared the confidential information with accused No.1 to 4/ exclusively belongs to Welldoc Software Pvt Ltd?

A: They have discuss about the software in the Skype chart.

Q: confidential information were not discuss in the entire skype chat?

A: I need to verify it.

Q: How much time is required for verify the skype chat?

A: I need 02 Weeks time to verify the Skype chat.

It is false to suggest that whatever information are with the accused No.1 to 4 are available in the public domain. It is false to suggest that whatever information available with accused No.1 to 4 does not belong to Welldoc Software Pvt. Ltd.

It is false to suggest that according to the employment contract with accused No.1 to 4 they were neither in the management nor in the financial role of Welldoc Software Pvt. Ltd.

It is false to suggest that at no point of time Welldoc Software Pvt. Ltd. as prevented its employees from taking up independent assignment outside the employment. Accused No.1 to 4 are bound by the employment contract and confidentiality agreement.

Q: No where in the Ex.P.12 to 15 it is mentioned that independent contract outside the employment is barred?

A: There is a clauses in the employment agreement.

It is true to suggest that I have given evidence in ID No.27/2018 before labour court on behalf of Welldoc Software Pvt. Ltd. against the accused No.2.

I may have deposed that while employed with Welldoc Software Pvt. Ltd. I have taken free liozning support from one Kiran Kumar for developing a Mobile App for your brother-in-law, at that point of time Kiran Kumar and my self was the full time employees of Welldoc Software Pvt. Ltd. I have go through that deposition. If I see the documents I am able to tell about it.

I am not aware that my brother in law company had paid remuneration Kiran Kumar for the said liozning support.

Defense Counsel has confronted a certified copy of the deposition of Billy Graham recorded in ID No.27/2018 before the court of Hon'ble 3rd Additional Labour Court, Bengaluru. I admit that it is the deposition given by me in ID No.27/2018 before the court of Hon'ble 3rd Additional Labour Court, Bengaluru. Witness admits the deposition given by me in ID No.27/2018 before the court of Hon'ble 3rd Additional Labour Court, Bengaluru. Hence, deposition given by the witness in ID No.27/2018 before the court of Hon'ble 3rd Additional Labour Court, Bengaluru is marked as Ex.D.1.

Q:Since there was no embargo for doing the free liozning work, you have taken the support of Kiran Kumar to help your brother in law while both of you

were employed with Welldoc Software Pvt. Ltd?

A: I don't think so. I don't agree.

Q: While employe with Welldoc Software Pvt Ltd. you have provided free liozning support to Mutti Prasad Rao for marketing product called Funtaipix through coffee day outlet?

A: There was a discussion. It was never a offer.

Q: Since there was no embargo to carry out the free liozning work hence, you have discussed with Mutti Prasad Rao?

A: I dis agree. When I had conversation Mutti Prasad Rao they were many discussions that doesnot mean that I gave an offer.

Further cross examination of PW1 is deferred as requested.

(Typed to my dictation in the open Court)

ROI & AC

IV ACJM, Bengaluru