



KABC170006212025



**DATED: 25.07.2025 PW.1 PRESENT AND OATH IS ADMINISTERED.**

**FURTHER EXAMINATION IN CHIEF BY ADVOCATE FOR PLAINTIFF:**

Today, I have filed my affidavit in lieu of examination in chief and the contents therein are true and correct, it bears my signature.

I have filed following documents in support of my case. They are marked as under:

Ex.P.1	SPA dated 21.08.2024.
Ex.P.2	Death certificate of T.R.Subramanyan.
Ex.P.3	Legal Heirship certificate.
Ex.P.4	Printout of Master Data of defendant No.1.
Ex.P.5	Agreement of sale dated 27.06.2012 between T.R.Subramanyan and defendant.
Ex.P.6	Agreement of sale dated 13.08.2012 between plaintiff No.3 and defendant.
Ex.P.7 to 10	Payment receipts issues in favour of T.R.Subramanyan 22.06.2012, 28.06.2012, 26.02.2014 and 30.06.2014.
Ex.P.11	Certified copy of the bank statement issued by City Union Bank for the period June 2012 and June 2013 and from 01.06.2014 to 31.12.2014.

Ex.P.12 to 15	Payment receipts issued to plaintiff No.3 dated 05.07.2012, 23.07.2012 (3 Nos).
Ex.P.16	Certified copy of the bank statement issued by Axis Bank for the period 01.09.2012 to 30.09.2012 and 01.05.2013 to 31.05.2013.
Ex.P.17	Printout of the email dated 01.09.2015.
Ex.P.18	Printout of the emails dated 18.04.2016 and 28.04.2016.
Ex.P.19	Letter dated 10.05.2016 issued by defendant.
Ex.P.20	Cheque dated 10.11.2016 issued in favour of T.R.Subramanyan.
Ex.P.21	WhatsApp communications with the defendant for the period 07.01.2019 to 24.07.2021.
Ex.P.22	WhatsApp communication between director of defendant No.1 with SPA holder of the plaintiff.
Ex.P.23	Office copy of the legal notice dated 21.05.2024 issued by plaintiff No.2 to defendant.
Ex.P.24	Reply dated 01.06.2024.
Ex.P.25	Office copy of the legal notice dated 21.05.2024 issued by plaintiff No.3 to defendant.
Ex.P.26	Reply to the said notice dated 01.06.2024.
Ex.P.27	Non starter report in PIM No.1919/2024.
Ex.P.28	Printout of email communications between plaintiff and defendant and its advocate.
Ex.P.29	Pendrive containing the audio conversation between defendant advocate and myself.
Ex.P.30	MOA of defendant No.1 downloaded from website of MCA.
Ex.P.31	Printout of the company details taken from website of Insta Financials.
Ex.P.32	Certificate u/S 63(4)(C) of BSA, 2023 with respect to email communications, WhatsApp messages, Master Data, MOA, Insta Financial report and payment certificate.

**Further Chief Examination:** Deferred at request.

(Typed to my dictation in the open court.)

**R O I & A C**

**(ARJUN S MALLUR)  
LXXXV ACC & SJ, BENGALURU.**