

BEFORE THE ADDITIONAL MASTER-III  
HIGH COURT, MADRAS.

TOS.No.11 OF 2024

Date: 09.04.2026  
Time: 11.05 A.M.

Name : Mr. K.N.Ramanathan (PW1)

Continuation of Cross Examination by Mr.Shanmuga Sundaram K.V,  
Learned Counsel for the defendants.

Solemnly Affirmed:

Q26:What it is your educational qualification and your occupation?

A: B.A.Economics and working as Music Teacher.

Q27:When was construction made in the property at No.4, Kalikundram 1<sup>st</sup>  
Street, Kalikundarm, Tharamani, Chennai – 600 113?

A: I do not know.

Q28:Who constructed the above said property and at what cost?

A: May be my father constructed the building. I do not know about the cost.

Q29:When was construction made in the property at No.6, Pillaiyar Koil  
Street, Kalikundarm, Tharamani, Chennai – 600 113?

A: I do not know.

Q30:Who constructed the above said property and at what cost?

A: I do not know.

Q31:When was your brother married?

A: My brother got married when he was aged about 21. I do not remember  
the year of marriage.

Q32:Where is your brother residing at the time of execution of Will in the  
year 1995?

A: No.41/1, Subramaniyam Street, Abirama Puram, Chennai – 600 018.

Q33: Where is your brother currently residing and since when?

A: I do not know the exact address. But he is residing at Coimbatore for the past 1 ½ years.

Q34: How much amount does your father transact in his business?

A: I do not know.

Q35: (Certified copy of the judgment and decree in TOS.No.21/2004 is shown to the witness) Is it right that you have filed OP.No.737/2001 converted to TOS.No.21/2004 for probate of Will dated 06.12.2000 and the same was dismissed by the Hon'ble Madras High Court?

A: Yes.

**Ex.D1 is the Certified copy of the judgment and decree in TOS.No.21/2004**

Q36: Is it right that you have marked the photocopy of the 1995 Will as Ex.P8 in TOS.No.21/2004?

A: Yes.

Q37: Did your father owned any vehicle for his transport?

A: In my school days, my father used Luna bike. After that my father did not used the above vehicle due to his hydrocele problem.

Q38: Is it right that your father was staying in the Kalikundram property at the time of execution of the 1995 Will?

A: No. Witness adds: My father was staying with my mother in Kalikundram property and also developing this property and used Nynon street property for his business purpose.

Q39: At which place and at what time your brother-in-law Mr.Ramachandran handed over the photocopy of the 1995 Will to you?

A: In my house. I do not remember the date. But he handed over the Will in the evening hours.

Q40: Does your brother-in-law Mr.Ramachandran frequently visit your house to meet with your father?

A: Yes. All the brothers-in-law will visit along with their family.

Q41: Who are the witnesses to the Ex.P3, 1995 Will?

A: My brother K.N.Srinivasan and my aunt's son (cousin) Kumar.

Q42: What was Mr.Kumar's age at the time of execution of Ex.P3 Will?

A: I do not know.

Q43: What was Mr.Kumar's educational qualification?

A: I do not know.

Q44: What was Mr.Kumar's occupation?

A: I do not know.

Q45: Where was Mr.Kumar residing at the time of execution of Ex.P3 Will?

A: I do not know the exact place. But it is near Valasaravakkam.

Q46: Why did you file the testamentary suit in TOS.No.21/2004 seeking for grant of letters of administration in respect of Will dated 06.12.2000 claiming to be executed by your father Mr.K.S.Narayanan instead of 1995 Will?

A: When I filed the OP.No.737/2001 in the year of 2000 I filed only photocopy of the 1995 Will since my father misplaced the 1995 original Will. After that my father told me since the original Will executed in the year 1995 Will was misplaced. So, he proposed to execute another Will and then my father executed another Will on 06.12.2000 instead of 1995 Will.

Q47: Who informed you about the misplacement of original 1995 Will?

A: My father.

Q48: Do you know when was the original 1995 Will was lost/misplaced by your father?

A: I do not know.

Q49: When did you came to know about the loss/misplaced of the original 1995 Will?

A: I came to know about the loss/misplacement of the original 1995 Will after two years later when the photocopy of the Will handed over to me.

Q50: Do you know who drafted the 2000 Will?

A: Mr.K.R.Shunmugam drafted all the two Wills, who is my father's friend and advocate.

Q51: Do you know Mr.K.R.Shunmugam personally?

A: I have seen him in my father's office. But I do not know him personally.

Q52: Lastly, when did you seen Mr.K.R.Shunmugam?

A: I do not remember.

Q53: (Ex.P4 Will is shown to the witness) Who are the witnesses to the Ex.P4 2000 Will?

A: My friend M.N.Raghunathan and now he is no more and Mr.G.Rajkumar, who was my friend and worked in the High Court.

Q54: When did your father and mother leave the house at Nynon street?

A: I do not remember date and year. Witness adds: Regularly, my father used this house for his office purpose.

Q55: What is the distance between the house at Nynon street and the house at Kalikundram, Tharamani were your father and mother staying?

A: Around 6 K.M.

Q56: What was the mode of transport that your father used to travel between Nynon street and the house at Kalikundram, Tharamani?

A: By Auto.

Time : 11.48 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III