

BEFORE THE ADDITIONAL MASTER-II

HIGH COURT, MADRAS

C.S.No.65 OF 2024

Date :05.08.2026

Time : 11.05 AM

Name : Mr.A.Shankar @ Savukku Shankar (DW1)

DW1 Cross examined by Learned counsel for the Plaintiff counsel
Mr.Aravind Srevatsa.

Solemnly Affirmed:

Q1: (proof affidavit is shown to the witness) Who prepared this proof affidavit?

A: I prepared.

Q2: (written statement is shown to the witness) Who prepared the written statement and the adoption memo filed by the defendants in this suit?

A:I prepared in consultation with my advocate.

Q3: What ever you have stated in your written statement and your proof affidavit are they based on your personal knowledge?

A:Yes.

Q4: What is your educational qualification?

A:10th Standard.

Q5: what is your occupation today?

A:I am a Youtube Journalist.

Q6: Apart from the 2nd defendant are you a director in any other company as on date?

A:Yes.

Q7: Can you name the company or companies in which you are director?

A: Savukku Consultant Pvt Ltd.

Q8: Is it correct to state that as on date the 2nd defendant company has not been struck off from the register of registrar of companies?

A: I do not know.

Q9: Is it correct to state that the 2nd defendant company has filed its balance sheet as on 31.03.2025 with the registrar of companies?

A: I am not aware.

Q10: Did you go through the plaint and the documents filed by the plaintiff in this suit before preparing your written statement and proof affidavit?

A: Yes.

Q11: Are you deposing in your personal capacity as 1st defendant or also on behalf of 2nd defendant company?

A: Both.

Q12: Is it correct to state that you have not filed any document in this suit authorizing you to depose on behalf of the 2nd defendant company?

A: Yes, I have not filed any authorizing letters. Witness adds: Since this is an one person company and I am the only person authorized to depose.

Q13: I put it to you that a one person company is also bound by the provision of the companies act 2013 and since you have not filed board resolution authorizing you to depose on behalf of 2nd defendant, you are not competent to depose on behalf of the 2nd defendant.

A: I deny.

Q14: Do you have any qualification or any degree in Journalism?

A: No.

Q15: Are you a member of any recognized body of press council of India?

A:No.

Q16: Did you work in Government service at any point of time?

A: Yes.

Q17: Can you state the period of service and the position which you serve

A: 21.10.1991 to 17.07.2008 as special Branch Assistant in Vigilance and Anti corruption .

Q18: Is there any one else in this court room who will depose on behalf of the defendant in this suit?

A: No.

Q19: Is it correct to state that you have not disclosed about your service in Government either in your proof affidavit or in your written statement?

A:Yes, Because it is not necessary.

Q20: Is it correct to state that you were suspended from service and ultimately dismissed from service?

A:Yes.

Q21: Is there any other suit or criminal action for defamation pending against you as on date?

A:I do not remember.

Q22: (Ex.P1 is shown to the witness) Who chose the text mentioned in Ex.P1 dated 04.03.2024?

A:Our editorial team.

Q23:Are you a part of your editorial team?

A:Yes.

Q24: Is it correct to state that you have not named any person or persons as editorial team either in your written statement or proof affidavit?

A: Yes.

Q25: (Ex.P2 is shown to the witness) Is it correct to state that Ex.P2 is the screenshot of your Youtube Channel Savvukku Media?

A: Yes.

Q26: (Ex.P3 is shown to the witness) In Ex.P1 there is a link to Youtube video and that video is Ex.P3?

A: Yes.

Q27: Who drafted the tag line to the video found in Ex.P3?

A: Our Editorial team.

Q28: According to you, what is your understanding of investigative journalist?

A: To verify the available information through multiple sources and corroborating them with supporting materials is investigative journalism.

Q29: Have you gone through the contents of pendrive filed by the plaintiff marked as MO-I and the transcript Ex.P4?

A: Yes.

Q30: Do you stand by the contents of MO-I and Ex.P4?

A: Yes.

Q31: Have you filed any documents in support of the allegations made by you in the impugned speech contained in MO-I and Ex.P4?

A: Yes.

Q32: Can you specify which are the documents you are referring to?

A: All the Exhibits filed are in support of the impugned speech.

Q33: I put it to you that Ex.D1 does not contain any reference to the plaintiff company and Ex.D1 is not relevant for the purpose of the present suit.

A: I deny.

Q34: I put it to you that Ex.D2 is a news article which is hearsay evidence and it does not state anything about involvement of the plaintiff company in any crime.

A: I deny.

Q35: I put it to you that Ex.D3 is a news article which is hearsay evidence and it does not contain any reference to the plaintiff company.

A: I deny.

Q36:(Ex.D3 is shown to the witness) Can you point out from Ex.D3 where the name of plaintiff company is mentioned?

A: In para 2 the name of Pettigo Comercio is mentioned. It is the group company of Plaintiff.

Q37: The name of the plaintiff company is not mentioned in Ex.D3. Is it correct?

A:Yes.

Q38: Have you placed any material in this suit to show that Pettigo Comercio is a group company of the plaintiff?

A:Yes.

Q39: (proof affidavit is shown to the witness) Can you identify which document you are referring to ?

A:Ex.D1.

Q40: I put it to you that Ex.D6 is a news article which is hearsay evidence and it is speculative.

A: I deny.

Q41: Have you placed any material in this suit to show that the daughter of DGP Shankar Jival acted in any film produced by the plaintiff company?

A: No.

Q42: I put it to you that Ex.D7 is the news article which is hearsay evidence and it is speculative.

A: I deny.

Q43: Is it correct to state that Ex.D8, does not contain any reference to the plaintiff company and it is not a relevant document in this suit?

A: It is not correct.

Q44: According to you the impugned speech was made by you solely based on Exhibits D1 to D8?

A: Apart from this I had various other materials most of the materials were seized by the police and in the custody of various courts.

Q45: Have you taken any steps to obtain certified copies of the so called documents you are referring to ?

A: Yes, I have taken steps.

Q46: Is it correct to state that you have not stated any particulars of documents allegedly in court custody or given any particulars of any other cases either in your proof affidavit or in your written statement?

A: Yes, it is correct.

Q47: Are you aware of the status of criminal investigation against Jaffer Sadiq referred to in Ex.D8?

A: No.

Q48: I put it to you that till date the plaintiff company has not been arrayed as an accused or called for investigation in relation to any matter connected to Jaffer Sadiq.

A: I am not aware.

Q49:(proof affidavit and Written statement are shown to the witness) Did you verify whether the plaintiff company was arrayed as an accused or called for investigation by any investigating agency in relation to Jaffer Sadiq before filing your written statement and proof affidavit?

A:Yes, I verified through multiple confidential sources before filing my written statement and proof affidavit.

Q50:What do you meant by multiple confidential sources?

A:In my profession, various sources inside agencies and outside agencies share information with me.

Q51:Are you going to examine any of the so called confidential sources in this suit?

A: If required, I will examine.

Q52: Can you name the sources?

A: Revealing them will prejudice their life and safety.

Q53: Is it correct to state that you have not mentioned anything about multiple confidential sources allegedly informing you about the investigation against Jaffer Sadiq and whether the name of the plaintiff company was arrayed as accused or called for investigation either in your proof affidavit or written statement?

A: Yes.

Q54: Is it correct to state that the plaintiff company has also filed criminal action for defamation as against you regarding the impugned speech dated 04.03.2024?

A: I am not aware.

Time :11:55 AM

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-II