

BEFORE THE ADDITIONAL MASTER-II

HIGH COURT, MADRAS

C.S.No.65 OF 2024

Date : 05.11.2025

Time : 11:15 AM

Name : Mr.Neelakant Narayanpur (PW1)

PW1 Cross Examination by Learned counsel for the Defendants
Mr.Gowtham Kumar.

Solemnly affirmed:

Q1:How long have you been a director of the Plaintiff company?

A:I have been a director since 2010.

Q2:As a director of plaintiff company, what are your roles in the management?

A:I am taking care of compliances, Legal matters, Police, RBI, ED and I am also the authorized signatory.

Q3:Apart from you who are the other directors of the plaintiff company?

A:The other director namely Mr.Prem Sivaswamy stays in London and I am the only director in Chennai.

Q4:Who was looking after the affairs of the plaintiff company between 2007 and 2010?

A:Mr.Prem Sivaswamy was also a director. There was also another director whose details I do not remember.

Q5:What are the other businesses conducted by the Lyca Group to which the plaintiff belongs to?

A:The main business of the Group is, we offer Mobile services across more than 20 countries.

Q6: What is the extent of Financial contribution by the plaintiff to the Lyca Group?

A:I am not a financial person. Hence I do not know.

Q7:Is the balance sheet of the plaintiff filed along with the group balance sheet for statutory compliances in other countries?

A:The Plaintiff's company is a Chennai based company as the company is registered in India and all the details such as Tax and others are submitted to the Indian authorities and not to authorities abroad.

Q8:So, is it correct to state that the plaintiff is a stand alone company?

A:As far as the financial requirements are concerned, we seek the assistance from the Head Quarters, London.

Q9:Who decides on the film production side for the plaintiff company?

A:Mr.Tamizh Kumaran.

Q10:What is the position of Mr. Tamizh Kumaran in the plaintiff company?

A:There is no specific designation. He is the head of the film division. There are other people working under him such as producers, executive producers, Marketing people, Story listeners etc.,

Q11:Did you discuss the present matter with Mr.Tamizh Kumaran before deposing evidence before the court ?

A:Yes, I have discussed.

Q12: (Para 3, Page No.2 of the proof affidavit is shown to the witness) Can you tell us who distributed the films “Don (2022), Ponniyin Selvan I (2022), Ponniyin Selvan II (2023), Theera Kaadhal (2023), Chandramukhi (2023), Mission-Chapter I (2023), Lal Salaam (2024), Indian-2 (2024) , Vettaiyan (2024) and Vidaamuyarchi (2025)”

A:I am not involved in the film related day-to-day affairs of the company. So, I am not fully aware about the distribution.

Q13:Can you tell who would be fully aware about the distribution of the films produced by the plaintiff company?

A:Mr.Tamizh Kumaran and the people working under him would be fully aware about the distribution of the films produced by the plaintiff company.

Q14:Would Mr.Tamizh Kumaran be deposing evidence before this court for this present suit?

A: I cannot tell only the board has to decide.

Q15:To what extent are you aware of the distribution of the Movies mentioned in the Para 3 of your proof affidavit?

A:I am aware to an extent of 15 to 20%, as I sign all the film distribution agreements.

Q16:Is it correct to state that the film distribution agreement have been signed by the plaintiff company with M/s.Red Giant Movies?

A:Yes.

Q17:Is it correct to state that a Majority of movies produced by the plaintiff company after 2021 have been distributed by M/s.Red Giant Movies?

A: I will check and answer to this question.

Q18:How many distribution agreements have you signed for the plaintiff company after 2021?

A:I will check and answer to this question.

Q19:Has the plaintiff company distributed any films produced by M/s.Red Giant Movies?

A:I will check and answer to this question.

Q20:Who handles the Youtube platform and other Social Media platforms of the plaintiff company?

A:We have a separate marketing division who takes care of the Youtube platform and other Social Media platforms of the plaintiff company.

Q21:Does this marketing division report to you?

A:No, they do not report to me.

Q22:(Para 4, Page No.3 of the Proof affidavit is shown to the witness) Who had given you the number of followers as mentioned by you, therein?

A:I got it from my marketing division.

Q23:Is it correct to state that you have not filed any of the plaintiff company's Social Media Platform profile in the present proceeding?

A:Yes, it is not filed.

Q24:Did you discuss the present matter with the marketing team of the plaintiff company before deposing evidence before the court ?

A:Yes, The discussion happens in a common way and not exclusively with the Marketing team.

Q25:(Plaint and Proof affidavit are shown to the witness) The number of Followers in the Social Media platforms of the plaintiff is identical in Para 5 of plaint and Para 4 of Proof affidavit despite the proof affidavit being filed almost after 18 months. Is it that the number of followers have not changed in these 18 months?

A:I will check and answer to this question.

Time : 12:12 PM

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