

BEFORE THE ADDITIONAL MASTER-II

HIGH COURT, MADRAS

C.S.No.65 OF 2024

Date : 08.12.2025

Time : 02.25 P.M

Name : Mr.Neelakant Narayanpur (PW1)

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

Solemnly affirmed:

Q26: Can you answer Q.No.17 now?

A: After 2021 out of 17 movies which we produced 7 were released through Red Giant Movies.

Q27: Do you remember as to who distributed the remaining 10 movies?

A: Most of the remaining movies distributed by our own distribution system. The remaining I am not aware.

Q28: How many movies has the plaintiff company produced in total?

A: I cannot tell the figure right away. I will have to verify and inform.

Q29: Can you answer Q.No.18 now?

A: I have signed close to 50 domestic agreement and I have signed over close to 100 international distribution agreements.

Q30: Can you answer Q.No.19 now?

A: No, we have not distributed any movies produced by Red Giant Movies.

Q31: Can you answer Q.No.25 now?

A: The numbers have changed. The numbers have increased from last time. X-Platform it is 1.3 million, Facebook 1.3 million, Youtube 4.52 million, Instagram 7.5 Lakhs.

Q32: What are the movies that the plaintiff company is producing now?

A: I do not know exactly. I will check and revert.

Q33: Are you aware if any person or legal entity has refused to work with the plaintiff company because of the interview and the tweet posted by the defendant?

A: I am not aware now. Witness adds: I will check and revert.

Q34: Have you filed any document or evidence to show that any person has refused to work with the plaintiff company because of the interview and the tweet posted by the defendant?

A: We have not filed.

Q35: Have you filed any of the financial statement of the plaintiff in the present proceedings?

A: We have not submitted.

Q36: How is the financial position of the plaintiff company now?

A: I am not aware since I am not connected to finance.

Q37: Have you filed any document to show that because of the impugned interviews and tweets there has been a fall in the financial position of the plaintiff?

A: No, I have not filed.

Q38: Is it correct to state that after you approached to the Court the impugned interviews have been taken down by Youtube?

A: I think they were taken down.

Q39: Before approaching the Court did the plaintiff raise any complaint with Youtube regarding the impugned videos?

A: I am not aware. Witness adds: I will have to contact the Social Media team.

Q40: Before approaching the Court did the plaintiff raise any complaint with X platform regarding the impugned tweet?

A: I am not aware. Witness adds: I will have to contact the Social Media team.

Q41: How proficient are you in Tamil?

A: I cannot read, speak and write Tamil. Witness adds: I can understand Tamil very little.

Q42: Have you seen the videos which you are alleging as defamatory in the plaint?

A: Yes, I did see.

Q43: Is it correct to state that the videos are in Tamil?

A: Yes.

Q44: Were you able to understand the interview?

A: I did not understand fully. I took the help of the legal team and they are proficient in Tamil.

Q45: Can you name the persons whose assistance you took for viewing the videos?

A: Mr.Iyyappan.

Q46: Is Mr.Iyyappan still associated with the plaintiff?

A: Yes.

Q47: What is his official capacity with the plaintiff?

A: I do not remember his designation. Witness adds: But he is the part of legal team.

Q48: (Deposition and Ex.P6 are shown to the witness). Refer to the answer to Q.No.3 and Is it correct to state that in Ex.P6 it is one Mr.Pramod Kumar Lalith Kapil Dev who has certified the copy of resolution dated 11.03.2024 of the plaintiff company?

A: Yes.

Q49: Is Mr.Pramod Kumar Lalith Kapil Dev a Director of the plaintiff company?

A: I do not have to give any false or wrong information. So I will have to check and revert.

Q50: How many interviews/programs of the defendant have you watched?

A: Only one. Other interviews I have not watched due to language problem.

Q51: (Para.14 of the proof affidavit is shown to the witness). Please refer to Para.14 of your proof affidavit. If you have not watched any of the other interviews how do you know that the first defendant has been in the habit of giving interviews in the Youtube by giving false and defamatory allegations?

A: These things were discussed in the office very much.

Q52: So, is it your statement that in your office you discussed about the 1st defendant giving interviews making baseless allegations against political parties, elected representatives, judiciary, various limbs of the Government etc?

A: Yes, we discussed in the office.

Q53: Is it correct to state that it was only based on the discussions in your office that you have made these averments and that you do not have any personal knowledge about the interviews and publications by the 1st defendant?

A: As admitted earlier personally I have not seen any interviews. But most of the interviews are observed by our legal staffs.

Q54: Can you name the legal staffs?

A: I can name only Iyyappan. Witness adds: There are some other legal staffs but I cannot name them.

Q55: What are the other defamation cases filed by the plaintiff?

A: We have filed defamation cases . Witness adds: I will verify and revert.

Q56: Have you perused the written statement and the documents filed along with the written statement in the present proceedings?

A: I have not perused.

Q57: Has the plaintiff faced or else facing any proceeding before the Enforcement Directorate (ED)?

A: As far as Lyca Production is concern I do not think there is any case with ED.

Q58: Is it correct to state that searches were conducted by ED in the premises of the plaintiff on 27.04.2023 and 16.05.2023?

A: I have to get information from my office.

Q59: Refer to Q.No.2 you have stated that your role in the management of the plaintiff company is taking care of compliances, legal matters, police, RBI, ED and I am also the authorised signatory. When this is the case whom do you have to verify with to find out whether the premises of the plaintiff company was searched by ED on 27.04.2023 and 16.05.2023?

A: As I was not completely present in the plaintiff company due to the admission of my mother in the hospital. So, I have to verify with the CFO.

Q60: Who is the CFO of the plaintiff company?

A: Changes has happened. Some people have left and some people have joined.

Q61: Can you name the person with whom you will verify for answering Q.No.59?

A: I will have to verify with the present CFO Mr.Pattani.

Time : 03.20 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

