

BEFORE THE ADDITIONAL MASTER-II

HIGH COURT, MADRAS

C.S.No.65 OF 2024

Date : 30.01.2026

Time : 12.00 P.M

Name : Mr.Neelakant Narayanpur (PW1)

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

Solemnly affirmed:

Q62: Can you now answer Q28?

A:More than 20.

Q63: Can you now answer Q32?

A:Today one of our movie has released and one other movie is in production.

Q64: Can you now answer Q33?

A:Some of the people have resigned and some of the people have left. I am not fully aware of the details.

Q65:To what extent are you aware of the details?

A:I know very little.

Q66: Can you now answer Q39 & Q40?

A:We have not approached youtube or X-Platform. We have decided to file a case in the court.

Q67: Can you now answer Q49?

A:He was a director for a very short time.

Q68:Can you inform the court for which period he was a director of the company?

A:I do not remember the period in which he was a director.

Q69:Is it correct to state that you have not filed any document in this case to show that Mr.Pramod Kumar Lalith Kapil Dev was a director of the plaintiff company at any point of time?

A:Yes, we have not filed any document but the Board Resolution authorizing me has been signed by him.

Q70:Was Mr.Pramod Kumar Lalith Kapil Dev drawing any salary as a director of the plaintiff company?

A:I am not aware.

Q71:Can you now answer Q55?

A:We filed a criminal case before Saidapet Metropolitan Court for the same subject matter.

Q72:Have the plaintiff filed defamation cases against any person other than the defendants?

A:We have filed it once before but I do not have the details.

Q73:Can you now answer Q58?

A:ED conducted raid on 16.05.2023 and not on 27.04.2023.

Q74:Can you confirm that you have verified the details of raid by ED with Mr.Pattani?

A:I did not verify with Mr.Pattani but I verified with some other financial person.

Q75:Can you name the person with whom you verified?

A:I have verified with G.M.Finance.

Q76:Is M/s.Pettigo Commercio Internacional Lda, an entity associated with the Lyca group ? (Counsel for the plaintiff raised an objection on point of relevancy)

A:Yes, it is associated with Lyca group.

Q77:Is Mr.Gaurav Chachra a person involved with the Lyca group?

A:Yes, he involved with Lyca group.

Q78:Are you aware of the press release which was given by Enforcement directorate after the raid in the premises of the Lyca group?

A:I am not aware.

Q79:Are you aware that Enforcement directorate was investigating into the complaint given by Lyca group against Kallal Group?

A:Lyca group has not given any complaint to Enforcement directorate against Kallal Group.

Q80:Did Lyca group give any complain against Kallal group to the Police?

A:Lyca group has not given any complaint against Kallal Group.

Q81:So, is it your statement that Lyca group did not give any complaint or grievance against Kallal Group?

A:Lyca group of companies in India did not give any complaint against Kallal Group. It is only M/s.Pettigo Commercio Internacional Lda, which has filed complaint against Kallal Group.

Q82:Is it correct to state that it is based on the complaint of M/s.Pettigo Commercio Internacional Lda, that the Enforcement Directorate raided the office of the plaintiff on 16.05.2023?

A:I do not know the reason behind the raid.

Q83: Is it correct to state that in the plaint and proof affidavit you have not mentioned anything about the raids conducted by the Enforcement Directorate?

A: Yes, It is correct.

Q84: Are you aware of what happened to the complaint given by M/s. Pettigo Comercio Internacional Lda against Kallal Group?

A: I am not aware.

Q85: Does the balance sheet of the plaintiff company get disclosed along with the balance sheet of Lyca group?

A: No.

Q86: I put it to you that the impugned videos and tweets is on the back ground of the complaint given by Lyca group, the proceeding of the Enforcement Directorate and the manner in which the entire issue was closed. What do you say?

A: I am not aware.

Q87: In reply to the Q14 you have stated that the Board has to decide whether Mr. Tamilkumaran would have to give evidence in the present matter. Has the Board decided?

A: Board has decided that he would not give any evidence.

Q88: Is the Lyca group in a financial trouble in UK? (Counsel for the plaintiff raised an objection on point of relevancy)

A: I am not aware.

Q89:I put it to you that the auditor of Lyca mobile UK refused to sign of on that company's account citing inability to obtain sufficient audit evidence including the recoverability of balance of almost 150 Million GBP from related parties and directors including the founder Mr.Alli Raja Subas Karan. What do you say?(Counsel for the plaintiff raised an objection stating that it is not relevant and there is no pleadings)

A:I am not aware.

Q90:In reply to Q44 to Q47 you have stated that you have taken the assistance of one Mr.Iyyappan for viewing the impugned videos. Would this Iyyappan be giving evidence before this court?

A:I have to ask the Board.

Q91:Is it correct to state that you are the director of the plaintiff company?

A:Yes

Q92:Who else has to decide about Mr.Iyyappan giving evidence before this Court?

A:Mr.Prem who is the other director has to decide.

Q93:(Para 23 of Proof affidavit is shown to the witness) Which according to the plaintiff is the defaming portion of the interview?

A:Here it says that Lyca is expected to offer a role for Jiwal's Daughter, in return of some favour from Mr.Jiwal.

Q94:Is the above allegation the only defamatory allegation in Para 23 according to you?

A:Whatever allegations are here I am not aware of other allegations.

Q95:I put it to you that even in January 2024 there were news report of the plaintiff's company producing a movie which would star Mr.Jiwal's daughter as a heroine. What do you say?

A:There might be media reports of making Jiwal's daughter as Heroine in our production. It never came to my knowledge.

Q96:Is it correct to state that from the transcription in para 23 of your proof affidavit the defendants only referred to Lyca in General and did not refer to the plaintiff in particular?

A:Lyca production is the only company of Lyca producing movies. So it is not general. It is Lyca production.

Q97:Therefore, according to you when the defendants said Lyca gave complaint during the year 2022, it was only the plaintiff that he was talking about and not the group?

A:Lyca did not give complaint as I said earlier. The complaint was given by different company.

Q98:(Proof affidavit is shown to the witness) Is it correct to state that transcript in Para 23 of your proof affidavit the defendant has also spoken about calling card business of the Lyca Group?

A:Yes. It is mentioned.

Q99:Is it correct to state that transcript in para 23 of your proof affidavit according to plaintiff the defendant has also spoken about the cash crisis that Lyca's businesses at Portugal and all over Europe was under due to fines by Europe union for evasion of tax?

A:Yes, it was spoken. But I am not aware.

Q100:Therefore I put it to you that the interview by the defendant is not restricted to the plaintiff company but was about the Lyca's group and others mentioned therein. What do you say?

A:Yes, he has spoken about other persons and other matters in the group. Apart from Lyca production he spoken about other persons and other businesses.

Time : 01.17 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