

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

TOS.No.25 OF 2022

Date: 04.06.2026

Time: 11.25 A.M.

Name : Ms. Sunitha Goyal (DW2)

Age : 39 Years

Husband's Name : Mr. Karan Goyal

Residential Address : Flat 17, Gee Gee Castle, 186/408, Lloyds Road,
Gopalapuram, Chennai – 600086.

Chief Examination by Ms. Meenatchi. M, Learned counsel for the Defendant.

Solemnly Affirmed:

Q1: Are you aware of the Will which is the subject matter of the suit?

A: Yes, I am aware.

Q2: Can you explain your relationship with the testator, Mr. Harichand?

A: He was my neighbor.

Q3: Do you know Mr. Harichand's family members?

A: Yes. He has two sons.

Q4: Are you aware of the contents of the Will of Mr. Harichand?

A: No.

Q5: Can you explain, how and when the Will came to be signed?

A: On 20.03.2019, I was present at Mr. Harichand's house where he got his friend Mrs. Kamalesh write the Will as per his dictation and once it was done Mr. Harichand read it and signed in it first and his friend Mr. Durga signed next as the witness and thereafter, I signed. When I reached Mr. Harichand's house on his call, a few minutes later Mr. Durga also came to Mr. Harichand's house and both of us were present when it was being written.

Q6: Who were all present in Mr. Harichand's house when you went there?

A: Mr. Harichand was present, Mrs. Kamalesh and the maid / cook were present.

Q7: Were any of Harichand's family members present in his house?

A: No.

Q8: Are you aware who generally lived with Mr. Harichand in that house?

A: Yes. His son Mr. Sanjay, Mr. Sanjay's wife Komal and their daughter, Anmol lived with Mr. Harichand.

Q9: For how long before the writing of the Will you had acquaintance with Mr. Harichand?

A: Around 8 or 9 years.

Q10: Do you know all his family members?

A: I do not know all his family members. I only know who lived with him in that house.

Q11: Are you and Mr. Sanjay's family still neighbors?

A: Yes.

Q12: Were you acquainted with Mr. Durga and Kamalesh before the Will was written?

A: I met Mr. Durga only on that day and I have met Mrs. Kamalesh sometimes when she had come to Mr. Harichand's house.

Q13: Are you aware of the health history of Mr. Harichand?

A: Not in detail.

Q14: Are you aware of his hospitalization?

A: No.

Q15: Do you know, how and when Mr. Harichand passed away?

A: Yes. He passed away due to old age and co-morbidities in July, 2019.

Q16: Did you attend the funeral and all the final rites that followed?

A: Yes. I attended the family rituals of the final rites.

Q17: Have you met Mr. Rajkumar?

A: Yes.

Q18: Did you know Mrs. Rani Harichand?

A: No.

Q19: Did Mrs. Kamalesh sign the Will?

A: No.

Q20: Was Mr. Harichand an able man during 2018-19?

A: Yes.

Q21: Were you aware of who was taking care of him?

A: Yes. His son Mr. Sanjay and his daughter-in-law Mrs. Komal were taking care of him.

Q22: Do you know Mr. Harichand was doing any business during his last two years?

A: Yes. I have seen him going to his office and coming back. He was active.

Q23: Do you know what business he was doing?

A: He was dealing with auto parts in GP Road.

Q24: Are you aware if he was completely taking care of the business by himself?

A: I am not aware of that.

Q25: Before signing of the Will, have you seen Mr. Harichand's signature earlier?

A: No.

Q26: Are you aware of the relationship between Mrs. Kamalesh and Mr.

Harichand?

A: I knew that they were friends.

Q27: Did Mr. Harichand discuss about the Will with you before the execution of the Will?

A: He just called me to come and sign as witness. I did not ask any details.

Q28: (Ex.P5, Will is shown to the witness.) Can you show your signature in Ex.P5 and say about who has written your name and address?

A: I had signed in page 2 of Ex.P5 and below my signature I have written my name and address.

Q29: Do you know what time of the day you signed in the Will?

A: I reached Mr. Harichand's house around 11.00 in the morning and I signed between 11.30 to 11.45 A.M.

Q30: After you have signed the Will, do you know what happened?

A: No.

Q31: Did you leave immediately after signing the Will?

A: I left after few minutes.

Q32: Who were all present when you signed the Will?

A: Mr. Harichand, Mrs. Kamalesh and Mr. Durga were present when I signed the Will and the maid was in the house.

Q33: Do you know when Mrs. Kamalesh and Mr. Durga left Mr. Harichand's house?

A: Mrs. Kamalesh left first, then Mr. Durga and thereafter, I left Mr. Harichand's house.

Q34: Are you aware of where the original Will was kept after signing it?

A: No. I am not aware.

Q35: Can you say as to how many drafts of the Will were made?

A: Only one.

Q36: Since you were present at the time of dictation of the Will, were you aware of the nature of arrangement made in the Will?

A: No.

Q37: After the death of Mr. Harichand, did you discuss about the Will with anyone?

A: No.

Q38: When did you become aware of the dispute between the plaintiff and the defendant?

A: Only when I got the summons from the court, I came to know about the dispute.

Q39: Between 2019 and the receiving of court's summons, were you aware about the Will being presented in court by Mr. Sanjay?

A: No.

Q40: Had Mr. Sanjay requested you to depose about the Will in court or sign any paper in this matter?

A: No.

Q41: Are you aware of Mr. Harichand having discussion with his son or family members before the execution of the Will?

A: No. I am not aware.

Cross Examination by the plaintiff counsel : Nil.

Time : 12.10 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