

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.
C.S.No.670 OF 2016

Date: 17.10.2025

Time: 11.20 A.M.

Name : Mr. S. Saravanan (PW1)

Further Cross Examination by Mr.Adi Narayana Rao, Learned counsel for the Defendant.

Solemnly Affirmed:

Q59: (Plaint is shown to the witness) Kindly see plaint para No.9 it has been mentioned that you have set up paying guest house business for the defendant. Have you filed any document to denote that business was set by you for the defendant?

A: No. Witness adds: Out of mutual trust and the bank transactions (Ex.P1) can be verified in the proof affidavit.

Q60: (Proof affidavit is shown to the witness) Kindly show where you have mentioned the name of the business set up by you for the defendant?

A: It is mentioned in Para No.19.

Q61: What is the name mentioned in para 19 of your proof affidavit regarding the business set up by you for the defendant?

A: No.

Q62: (Written statement is shown to the witness) The defendant in para 9 of the written statement has mentioned that you also had two firms namely Discountsvu.com and Invittytradez Private Limited. Is it correct?

A: Yes.

Q63: (Downloaded web copy of discountsvu.com is shown to the witness) Kindly see if the document shown to you is the details of the firm discountsvu.com available in the website denoting the partners and the nature of business of the said firm?

A: I have to check it.

Q64: Can you say who are the partners in firm namely discountsvu.com when it was incorporated _____ and _____ thereafter?

A: _____ Me _____ and _____ my _____ brother.

Q65: Can you say what was the business of the above mentioned firm discountsvu.com?

A: _____ Online _____ trading.

Q66: Can you elaborate the details of the business?

A: _____ Online _____ selling _____ of _____ electronics, _____ sarees, _____ etc.

Q67: (Plaint is shown to the witness) If your claim as per para 9 of the plaint that you have set up business for your wife you would have set up any business you would have definitely incorporated her name and since no business was set up for her there is no documents _____ produced _____ by _____ you.

A: No. Witness adds: Till this date I have not seen her educational certificate, which she claims to be a Bachelors and Masters graduate and she wants to run some business. The _____ option _____ was _____ to _____ set _____ up _____ business _____ for _____ her.

Q68: Have you claimed anywhere in your plaint that you have doubt on the educational qualification of the defendant and that because of which you did not include her name in any _____ of _____ the _____ business _____ done _____ by _____ you?

A: No. Witness adds: It is in complete prerogative of the business partners.

Q69: Is it true that in the company namely M/s.Invittytradz Private Limited also the defendant was neither a director nor shareholder from the date of commencement in 2013?

A: This company name is mentioned above is wrong. Hence, I am unable to answer this question.

Q70: (Web information of Invitty tradez Private Limited is shown to the witness)
Kindly see if this company was commenced by you?

A: I can't verify the genuinity of the records.

Q71: Do you have any private limited company incorporated in the name of Invitty Tradez Private Limited?

A: Yes.

Q72: Can you say who were the directors of the company at the time of incorporation and thereafter?

A: Yes, me and my brother at the time of incorporation. Then me and Rathish are the Directors. It is changed 3 or 4 years back.

Q73: I put it to you that the above details will confirm that at no point of time defendant was involved or did any business with you or under your guidance.

A: I deny. Witness adds: The fact that the defendant siphons money with or without my knowledge. So, I have to keep the defendant transactions separately and as a partner to fulfill her needs.

Q74: (Plaint is shown to the witness) Have you mentioned in the plaint that the defendant has siphoned your money and as to when you got knowledge of the same?

A: It is mentioned in para No.5.

Q75: I put it to you that you are telling lie and there is no mention of defendant siphoning money in para 5 of the plaint.

A: No.

Q76: (Plaint is shown to the witness) Kindly show the word "siphon" in para 5 of the plaint.

A: The word "siphon" is not specifically mentioned in the plaint para No.5. Witness adds: I have stated the facts in para 5 of the plaint.

Q77: (Plaint is shown to the witness) Kindly see para 15 of the plaint. You have mentioned that “the apartment building constructed over said items of property morefully described in item 3 of plaint schedule property belongs absolutely to the plaintiff with absolute ownership and title. The defendant does not have any claim over the said property except the entitlement of 37% share in the rental income that is to be derived out the said building superstructure” Have you filed any deed or letter of the defendant to confirm that she has accepted to relinquish all her rights in suit item 3 which is built on suit item 1 and 2 and that she accepted only to receive 37% rental income derived from the same?

A: No. Witness adds: I have provided bank statements which gives her share till the incident of attempt to murder occurred.

Q78: Can you say when the alleged incident of attempt to murder happened?

A: In June 2016.

Q79: I put it to you that from 01.04.2010 till June 2016 there was no money parted by you from the rental income as 37% share claimed by you and if the same was paid you would have given the dates, amount paid to the defendant specifically in the form of the account statement.

A: I deny. Witness adds: Karnataka bank statement can be provided. Kotak bank statement already been provided.

Q80: (Proof affidavit is shown to the witness) Kindly see para 15 of your proof affidavit. You have mentioned that between 2006 to 2008 you have paid defendant's father Rs.25 Lakhs for construction of suit item 3. Have you provided the break up for the same?

A: No. Witness adds: Out of trust I have not maintained all the records in black and white and this amount was given for the suit item No.2 and 3.

Q81: I put it to you that defendant's father was not even the owner of the property in the year 2006 and the construction was also not commenced until August 2008 as admitted by you in the plaint para 14 and hence the claim of paying money prior to the same is invented by you.

A: I am not sure. Witness adds: Out of trust I given money for the purchase of land and construction.

Q82: (Plaint is shown to the witness) Have you claimed in your plaint that you have paid money for purchasing suit item 1 or 2 and the consideration paid for the same?

A: No. Witness adds: I gave the money out of trust till her father was arrested for attempt to murder case to take out the property. After then I came to know about the family true colors and subsequent to that I maintained all the records for item No.4.

Q83: Have you filed any document to show that defendant's father was arrested?

A: No. Witness adds: I can provide the FIR number.

Q84: Please provide the FIR number?

A: I have the FIR number only in my phone. Now I do not remember the FIR number.

Q85: Can you tell which month and year you came to know about the true colors of defendant and her family members as claimed by you above?

A: In 2009 when I was in US, defendant was not reachable on phone for 5 days. Then I came to know that the defendant's father was in Saidapet Sub Jail.

Q86: Can you tell the month in 2009 when the above said incident was happened?

A: I do not remember.

Q87: I put it to you that your claim are false and even according to your own proof affidavit even in 2010 and thereafter in 2012, 2014 there has been transactions between you and defendant's father.

A: Claim is not false. Witness adds: Transactions was for business and construction purpose and nothing personal.

Q88: I put it to you that suit item No.2 was taken by you from the defendant as security for a soft loan extended by you to her father and on assurance that on repayment of the

same it would be return to her and towards repayment you have been collecting the rents from suit item No.3 and the excess rents were used for construction of suit item 5.

A: No. Witness adds: There is no such agreement. Defendant and her family making this story after the defendant and her mother, her aunt got red handed in SC301/2017 as accused A1, A2, A3.

Q89: I put it to you that the criminal case was foisted by you to grab the property of the defendant and now you are trying to twist the story otherwise.

A: No. I am claiming only my lawful investments and I have no intend to grab the property of the defendant while she might be having several other properties. It is seen from the plaint I am only claiming for the investments I have done.

Q90: Have you ever resided in suit item 1,2 and 3?

A: No. Witness adds: It was given for rent after completion of the construction.

Q91: I put it to you that the construction of suit item 3 was completed by March 2010 and was also rented from 01.04.2010.

A: I do not remember the exact date.

Q92: I put it to you that you deliberately telling lies claiming that you don't remember the same when it can be seen from Ex.P1 that rent was remitted into the said account from June 2010 itself.

A: No. I am not telling lie. Q.No.91 was not asked related to Ex.P1.

Q93: (Ex.P1 is shown to the witness) Kindly see your proof affidavit para 15 the second column denotes payment of Rs.10 Lakhs to the defendant's father on 23.09.2008. Kindly show if the said payment is reflecting on the said date in the name of defendant's father in Ex.P1.

A: No. Witness adds: The cheque was issued on 23.09.2008 and the clearance of the same amount is reflected in Ex.P1 on 26.09.2008.

Q94: (Ex.P1 is shown to the witness) Is the name of the defendant's father reflecting the same in Ex.P1?

A: No. Witness adds: This statement mentioned as to CLG.

Q95: Kindly see para 15 of the proof affidavit other than few payments in the name of defendant's father D.Parthasarathy and defendant's brother P.Balaji Prasad many payments are made to the third parties and you are trying to portray falsely as if the same was paid for suit item No.3

A: No. Witness adds: This payments were made to tiles for construction, Revenue Officer, Sewerage board, CMWSSB, Rathna Fan House for furnishing the property and few other labour payments to complete the construction.

Q96: I put it to you that you are telling lie and the details mentioned by you above does not pertain to any construction activities.

A: I deny.

Q97: Can you specify regarding the details of cash of Rs.1 Lakhs given on 26.11.2009 in para 15 of your proof affidavit.

A: Cash given for construction purpose.

Q98: Have you mentioned to whom the said money was given in your proof affidavit?

A: No.

Q99: Most of the details are fake details invented by you to make false claim of incurring Rs.68,62,927/- for construction of suit item property.

A: No. Witness adds: I given details for every transactions except for the one mentioned above as I already stated I am not maintained all the records in Black and white because of trust.

Q100: So, you had trust even in 2010 on the defendant.

A: No.

Q101: Can you elaborate the answer No for Q.No.100?

A: She was siphoning money with or without my knowledge. She used to pledge jewels without my knowledge. She was not truthful to me and the only reason I have to adjust all the atrocities the painful nature she acts on me. Only because of my son Kaveen Krithyk the defendant never used to take care of the son and she was roaming without taking care of family and spent thrift. In spite of the fact that when she was diagnosed with ASD heart disease I have make sure that she gets surgery with one of the best cardiologist in America and with her nature of not being truthful to me. For instance she took money from her parents stating that I wanted money for the surgery and she put the money to hide something which I believe because of some vague relationship even before the marriage.

Q102: Kindly see your proof affidavit. Have you filed any document to show the payments mentioned by you for suit item 3 to Daniel Ceramic, Rev.Officer, CMWSSD, Vinod Kothari, Kumaragurunathan, Arihant, Jagamohan, Arihas, Rathna Fan House, Sri Vijaya, Self (Labour payment), S.Gopinath, Balaji, Srivijaya.

A: No, all the receipts including my property documents, professional awards, coin collections everything was under her custody and after the attempt to murder incident it was not handed over to me.

Q103: I put it to you that you are telling lies to cover the fake statement of payment invented by you.

A: No. Witness adds: One of the property document in Vandaloore was collected by the defendant's father office staff and it is still under the defendant's custody.

Q104: Have you mentioned the said allegations in your plaint or by way of reply statement?

A: No. Witness adds: In the proof affidavit I mentioned it para 43 and 46.

Q105: I put it to you that there is no details mentioned regarding the immovable property purchased by you at Vandaloore in para 43 and 46 as claimed by you.

A: Yes. Witness adds: The above questions responds for all the general custody with the

defendants in specific to vandaloor property. I am not contending the part of this case.

Q106: (Plaint is shown to the witness) Kindly see para 14 of the plaint you have mentioned that Rs.66 Lakhs was raised by way of loans and mortgage of jewels by the plaintiff to construct suit item 3. Have you file any document denoting pledging of jewels or raising of loan by you as claimed above?

A: No.

Q107: I put it to you that the claim of raising loan and mortgaging jewels by you to construct suit item 3 was invented by you and hence no document was filed by you.

A: I deny.

Q108: I put it to you that the mortgage done by the defendant claimed by you above was to support the business done by you and she did not mortgage her jewels for her personal needs or other needs as claimed by you.

A: I deny. Witness adds: Of late in 2016 I have provided and email from the defendant's bank manager to collect the jewels. She has also pledge jewels in various banks in the MCC Bank, Adyar, MCC Bank Santhome and receipts are under her custody.

Q109: (Plaintiff side documents shown to the witness) Can you specify the document mentioned above is marked as which exhibit?

A: Ex.P13.

Q110: (Ex.P13 is shown to the witness) Kindly state how you receive the said email and from whom as per this document and the date on which you received the same?

A: Email was sent by defendant's father to the defendants on March 14,2016. This email was forwarded to me on 19.09.2016.

Q111: Were you in talking terms and communicating with defendant during till September 2016?

A: I am not sure about the question. Witness adds: Till June 2016 when the incident attempt to murder happened communication was there and after then there is no

communication and I am not sure about why she sent this email to me.

Q112: I put it to you that being a IT scientist you have been using her email Id and created this document to portray false things.

A: No, I deny. Witness adds: The bank reference number stated in the letter, can be checked with the Syndicate Bank, Saidapet.

Q113: (Ex.P13 is shown to the witness) In second page of Ex.P13 is any signature found or it is merely typed content?

A: No signature.

Q114: I put it to you that you have been unlawfully using the defendant's email ID and that is why you have managed to create the first page of Ex.P13.

A: I deny.

Q115: (Ex.D3 is shown to the witness) You claimed that for your investment suit item 2 was given to you. Does the settlement deed marked as Ex.D3 denote payment of any consideration for execution of the same?

A: No, I understand that the settlement deed does not need to be under the question clause.

Q116: Have you file any document to show that property tax for suit item 3 which is in suit item 1 and 2 are paid by you or even if the same is assessed in your name?

A: No. The assessment officer for both suit item 1 and 2 has put defendant's name in the record.

Q117: I put it to you that since the suit item 2 was given a security the property tax was not changed in your name and also not paid by you till date.

A: No. Witness adds: There is no security document exist as stated above in this question.

Q118: Can you say on whose name the electricity supply is assessed for suit item 3 which is in suit item 1 and 2 till date?

A: I do not know. Witness adds: Out of the trust I am not made an attempt to check.

Time : 01.30 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