

BEFORE THE ADDITIONAL MASTER-IV
HIGH COURT, MADRAS.

T.O.S.No. 17 OF 2025

Date: 09.09.2026

Time: 11.12 A.M.

Name : Mr. M. Senthil Kumar (PW1)
Age : 54 Years
Father's Name : Late S. Maharaja Pillai
Residential Address : No.17/7, 5th Street, Rajaji Nagar, Villivakkam,
Chennai – 600049.

Chief Examination by Mrs. Sheela, Learned counsel for the Plaintiff.

Solemnly Affirmed:

I am the Plaintiff herein. I am well acquainted with the facts of this case. I am filing my proof affidavit today and the same may be treated as part and parcel of my chief examination. The following documents are marked as exhibits.

Ex.P1 is the photocopy of the sale deed in Doc.No.268/1953 registered on the file of SRO, Sembiam, Perambur dated 23.02.1953. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P2 is the photocopy of the registered Will deed executed by Mr. S. Annamalai and Mrs. Parvathy Ammal in favour of Mr. Karunakaran and defendant Mrs. Ramalakshmi dated 05.01.1981. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P3 is the computer generated copy of the death certificate of S. Annamalai dated 22.10.1986.

Ex.P4 is the photocopy of the sale agreement executed by defendant R1 Mrs. Ramalakshmi in favour of Mr. Karunakaran dated 04.12.2002. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P5 is the photocopy of the family arrangement and release deed executed by defendant R1 Mrs. Ramalakshmi in favour of Mr. Karunakaran dated 07.03.2003. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P6 is the photocopy of the proof copy of sale consideration paid by Mr. Karunakaran through IOB, Cheque No.781699 dated 07.03.2003 in favour of defendant R1 Mrs. Ramalakshmi and received.

Ex.P7 is the photocopy of the settlement deed executed by Mrs. Parvathy Ammal infavour of Mr. Ramalakshmi under document No.975/2003, registered on the file of SRO Konnur dated 07.03.2003. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P8 is the photocopy of the patta issued by tahsildar in favour of Mr. Karunakaran dated 25.02.2013. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P9 is the photocopy of the building plan approval issued by planning authority of Chennai corporation in favour of Mr. Karunakaran dated 23.03.2015.

Ex.P10 is the photocopy of the house tax paid by Mr. Karunakaran to the Chennai corporation.

Ex.P11 is the photocopy of the electricity connection and consumption bill.(Original of 5 & 6 pages are produced, compared and returned to the plaintiff's counsel.)

Ex.P12 is the computer generated copy of the death certificate of Mrs. Parvathy Ammal dated 27.05.2008.

Ex.P13 is the computer generated of the death certificate of Mrs. Vanaja dated 24.01.2012.

Ex.P14 is the photocopy of the discharge summary issued by Prashanth Hospital, Madhavaram, Chennai – 600099 dated 14.03.2022.

Ex.P15 is the photocopy of the medical certificate issued by Prashanth Hospita, confirming Mr. Karunakaran was of sound mind dated 14.03.2022. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P16 is the original registered Will deed executed by Mr. A. Karunakaran in favour of plaintiff Mr. M. Senthil Kumar who is brother-in-law dated 20.04.2022.

Ex.P17 is the photocopy of the identity of A. Karunakaran Aadhaar Card No.3545 9842 7777. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P18 is the computer generated copy of the encumbrance certificate in respect of the suit property issued by SRO, Konnur dated 19.04.2022.

Ex.P19 is the computer generated copy of the death certificate of Mr. A. Karunakaran dated 06.08.2022.

Ex.P20 is the photocopy of the counsel's notice caused to be issued by the 1st defendant to the plaintiff dated 20.08.2022.

Ex.P21 is the office copy of the reply notice caused to be issued by the plaintiff to the 1st defendant dated 27.08.2022.

Ex.P22 is the photocopy of the Aadhaar card of Mr. M. Senthil Kumar – Legatee. (Original is produced, compared and returned to the plaintiff's counsel.)

Ex.P23 is the photocopy of the plaintiff family card for residential proof.
(Original is produced, compared and returned to the plaintiff's counsel.)

The objections for marking of photocopies are marked as exhibits
subject to proof, relevancy and admissibility.

Time : 11.42 A.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-IV