

BEFORE THE ADDITIONAL MASTER IV,
HIGH COURT, MADRAS
C.S.No.47 OF 2021

Date: 11.11.2024
Time : 02.49 P.M.

Name : Mr. G. Jayachandra Naidu (PW1)
Age : 71 Years
Father's Name : Mr. G. Chandrasekara Naidu
Office Address : No.3, Loop Street, Kottur Garden, Kotturpuram,
Chennai – 600085.

Chief Examination by Mr. Raja Loganathan, Learned Counsel for the plaintiff.

Solemnly affirmed:

I am the 2nd plaintiff herein and as such I am well acquainted with the facts of the case. I am filing my proof affidavit for myself and on behalf of the 1st plaintiff also stating the facts of this case and the same may be treated as part of my evidence in chief.

Ex.P1 is the printout of the e-mail letter sent by 1st plaintiff to defendant dated 12.01.2016.

Ex.P2 is the printout of the e-mail letter sent by 1st plaintiff to defendant dated 01.02.2016.

Ex.P3 is the printout of the e-mail letter sent by 1st plaintiff to defendant dated 04.02.2016.

Ex.P4 is the printout of the e-mail letter sent by defendant to 1st and 2nd plaintiff dated 11.02.2016.

Ex.P5 is the printout of the e-mail letter sent by defendant to 1st and 2nd plaintiff dated 13.02.2016.

Ex.P6 is the printout of the e-mail letter sent by 1st plaintiff to defendant dated 15.02.2016.

Ex.P7 is the printout of the e-mail letter sent by 1st plaintiff to defendant dated 22.06.2016.

Ex.P8 is the printout of the e-mail letter sent by 1st plaintiff to defendant dated 08.11.2016.

Ex.P9 is the printout of the e-mail letter sent by defendant to 1st plaintiff dated 08.11.2016.

Ex.P10 is the printout of the e-mail letter sent by defendant to 1st plaintiff dated 08.11.2016.

Ex.P11 is the printout of the e-mail letter sent by 1st plaintiff to defendant dated 11.09.2017.

Ex.P12 is the printout of the e-mail letter sent by defendant to 1st and 2nd plaintiff dated 20.09.2017.

Ex.P13 is the office copy of the legal notice sent by 1st and 2nd plaintiff to defendant dated 23.11.2017.

Ex.P14 (Series) (2 Nos) are the original returned covers from defendant to plaintiffs advocate.

Ex.P15 is the photocopy of the quarrying lease issued by Department of Mines & Gelogy, Kolar Karnataka to 1st plaintiff dated 10.12.2010.

Ex.P16 is the photocopy of the irrevocable General Power of Attorney given by 1st plaintiff to defendant dated 22.03.2013.

Ex.P17 is the photocopy of the letter of authorization given by 1st plaintiff to the Senior Geologist Department of Mines & Geology, Kolar, Karnataka dated 13.05.2013.

Ex.P18 is the photocopy of the minor mineral permit issued by Department of Mines & Geology, Kolar, Karnataka to 1st plaintiff dated 07.06.2013.

Ex.P19 is the photocopy of the minor mineral permit issued by Department of Mines & Geology, Kolar, Karnataka to 1st plaintiff dated 12.07.2013.

Ex.P20 is the photocopy of the minor mineral permit issued by Department of Mines & Geology, Kolar, Karnataka to 1st plaintiff dated 05.10.2013.

Ex.P21 is the photocopy of the invoice No.1 issued by 1st plaintiff to Mahija Granites dated 16.06.2013.

Ex.P22 is the photocopy of the invoice No.2 issued by 1st plaintiff to Mahija Granites dated 16.06.2013.

Ex.P23 is the photocopy of the invoice No.3 issued by 1st plaintiff to Mahija Granites dated 22.06.2013.

Ex.P24 is the photocopy of the invoice No.5 issued by 1st plaintiff to sun bright Granites dated 08.07.2013.

Ex.P25 is the photocopy of the invoice No.6 issued by 1st plaintiff to sun bright Granites dated 12.07.2013.

Ex.P26 is the photocopy of the invoice No.9 issued by 1st plaintiff to sun bright Granites dated 18.09.2013.

(The counsel for the defendant objects on the ground that Ex.P15 to Ex.P26 are photocopies.)

Section 65B certificate is filed for Exs.P1 to P12.

Time: 03.13 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be true and correct and signed before me.

ADDITIONAL MASTER-IV