

BEFORE THE ADDITIONAL MASTER IV,
HIGH COURT, MADRAS
T.O.S.No.68 OF 2024

Date: 05.12.2025
Time : 11.19 A.M.

Name : Mrs. S. Sujatha (PW4)

Cross examination by Mr. K.B. Gopi, Counsel for the defendant.

Solemnly affirmed:

Q1: Who is the plaintiff?

A: He is my husband.

Q2: What was the relief sought in the suit?

A: The plaintiff claimed that the suit property belongs to him.

Q3: Is it correct to state that you have stated in your proof affidavit that you have signed in the Will as the 2nd attester?

A: Yes.

Q4: I put it to you that the signature is invalid as you are an interested witness.

A: I deny.

Q5: I put it to you that the Will, Ex.P1 is not executed by deceased Kuppu Rao and it is a fabricated and forged Will.

A: I deny.

Q6: Can you say, the date on which you have signed in the Will?

A: 06.11.1998.

Q7: Are you aware of the document which was signed on 06.11.1998 by you?

A: I do not know which document I signed. Witness adds: He used to get the signature in the rental agreements. After his demise only, I came to know that the document which I have signed is a Will executed by my father-in-law, Kuppu Rao.

Q8: I put it to you that your father-in-law do not have any title to the property and he is only a lease cum agreement holder. (The counsel for the plaintiff objects to raise this question on the ground that the witness has not stated anything about the nature of the suit property.)

A: I deny. My father-in-law only purchased the property.

Q9: I put it to you that your father-in-law never executed the Will, Ex.P1.

A: I deny.

Q10: I put it to you that the Will, Ex.P1 is a fabricated and forged document in which you have signed as witness.

A: I deny.

Q11: In your proof affidavit you have stated that you have taken group photo in the year 2010. What is the relevancy to this case?

A: The group photo shows that who are all alive and who are all dead.

Q12: I put it to you that the group photo is not necessary to this proceedings and the death certificates are sufficient and you have stated only for the sake of this case.

A: I deny.

Q13: You came to know about the Will, after the demise of your father-in-law, Kuppu Rao, is it correct?

A: Yes.

Q14: But in para 3 of your proof affidavit you have stated that the deceased Kuppu Rao had obtained your signature in the last Will, is it correct? (The counsel for the plaintiff objects to this question on the ground that the witness has stated in the proof affidavit as last Will based upon the knowledge she got after the demise of Mr. Kuppu Rao.)

A: Yes.

Q15: Is it correct that at the time of signing the document, you did not know about the nature of the document?

A: Yes.

Q16: I put it to you that Ex.P1 is a created document and not executed by Late Kuppu Rao.

A: I deny.

Q17: In para 6 of your proof affidavit you have stated that you know the signatures of your father-in-law and your mother-in-law, is it correct?

A: Yes.

Q18: I put it to you that you do not know the signatures of your father-in-law and your mother-in-law and you are deposing falsely before this court for the sake of this case.

A: I deny. I happened to see the signatures of my father-in-law and my mother-in-law when they used to sign in the bank documents.

Q19: I put it to you that you do not know about the signature and hand writing of your father-in-law and the Will was not executed by Kuppu Rao and it is a created document.

A: I deny.

Q20: Is it correct to state that without knowing the contents of the Will, you have signed at the instance of your father-in-law?

A: Yes, he used to get signature in the rental agreements.

Q21: I put it to you that the Will, Ex.P1 is a created document and you have signed in the Will and you are falsely deposing before this court for the purpose of this case.

A: I deny.

Q22: I put it to you that without knowing the contents of the Will, you have signed at the foot of the document at the instance of your father-in-law.

A: Yes. He used to get signature in the rental agreements.

Q23: I put it to you that the deceased Kuppu Rao has not executed the Will in a sound state of mind.

A: I deny. At the time of execution of the Will, he was only 50 years. Only at the age of 80, he died.

Q24: I put it to you that you are falsely deposing that the deceased Kuppu Rao was in a sound state of mind and he has not executed the Will.

A: I deny.

Q25: I put it to you that it is false to state that the testator has signed the Will and the Will, Ex.P1 was not executed by him and it is a created document.

A: I deny.

Q26: I put it to you that the plaintiff has no locus standi to file the suit and the suit has to be dismissed.

A: I deny.

Re-Examination : Nil.

Time: 11.48 A.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