

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

Date: 08.01.2026
Time : 10.58 A.M.

Name : Mrs. R. Sujatha Ramesh Pawar (DW1)

Cross examination by Mr. Mahesh, Counsel for the plaintiff.

Solemnly affirmed:

Q1: What is your husband's name?

A: Ramesh Kuppu Rao.

Q2: What relief have you sought for in CS.No.240/2024?

A: This suit was filed for physical partition of my matrimonial home in Virugambakkam in 2020 as OS.No.534/2020 before the City Civil Court.

Q3: In whose property are you claiming partition?

A: My father-in-law, Mr. Kuppu Rao's property.

Q4: Did he purchase the suit property as a self acquired property?

A: Yes. It was a self acquired property of Mr. Kuppu Rao.

Q5: For what relief Mr. Soorya Prakash filed the case in TOS 68/2024?

A: Soorya Prakash has filed the suit claiming that there is a Will written by his father on his behalf in 1998 but I am saying that it is a forged and fake Will created after Mr. Kuppu Rao passed away in 2022.

Q6: What is the date of the Will executed by Mr. Kuppu Rao?

A: They are saying as per the Will the date mentioned is somewhere around 19.04.1998. I am not sure if it is correct.

Q7: I put it to you that the Will date is 06.11.1998 and you are wrongly mentioning.

A: When I am saying the Will itself is a fake and created and forged document, it does not matter the date mentioned in that Will.

Q8: I put it to you that you have not perused the Will and that you have deliberately filed this case being greedy to grab the suit property.

A: It is an unregistered Will. Also, the sale deed is still not issued for that property which means there is no absolute ownership for that property for anyone to execute a Will for that property. Also, the mentioned witnesses are closely related people, mother and wife of Soorya Prakash. So, I am very clear that this is a fake and forged document.

Q9: What is the date of your marriage with Mr. Ramesh Kuppu Rao?

A: I got married to Mr. Ramesh Kuppu Rao on 24.05.2000 and it was a properly arranged marriage.

Q10: Before your marriage, Mr. Ramesh Kuppu Rao has agreed to give the suit property in favour of Mr. Soorya Prakash to carry on construction by way of family arrangement, is it correct?

A: It is totally a false statement.

Q11: I put it to you that Mr. Kuppu Rao executed the Will dated 06.11.1998 subsequent to the consent of your husband in accordance with a family arrangement.

A: It is again a false statement. When I filed the partition suit in 2020, Mr. Kuppu Rao was alive and he had come to the case hearing and mediation sessions in which he never mentioned about the Will. Nor has he in his written statement mentioned about the Will.

Q12: What is the date of death of your husband?

A: My husband, Mr. Ramesh Kuppu Rao passed away on 12.04.2018 after having undergone close to 8 surgeries due to his bad health condition after marriage.

Q13: Did your husband claim any share in the suit property from your father-in-law during his lifetime?

A: My husband never claimed any share in the property till he was alive knowing that his father will divide his property among all the children equally.

Q14: I put it to you that you are falsely deposing that it was already decided through family arrangement that the suit property must be given to Mr. Soorya Prakash and for that reason Mr. Ramesh Kuppu Rao has not claimed the share in the suit property.

A: Both Mr. Kuppu Rao and my husband, Mr. Ramesh Kuppu Rao were not even knowing that there is something called Will would come up when they were alive. So, this is a totally false statement.

Q15: Have you mentioned in your plaint in CS 240/2024 that your husband was under the impression that the suit property would be divided equally among all the legal heirs?

A: Yes, it is mentioned in OS.No.534/2020 when I filed the partition suit that I am claiming only my legal rightful share in that property.

Q16: (Plaint in CS 240/2024 is shown to the witness.) In your earlier answer to Q.no.14, you have admitted that your husband was under the impression that the suit property would be divided equally among all the legal heirs. Can you say, where it is stated in the plaint?

A: In para 12 of the plaint in OS.No.534/2020 before City Civil Court which is now transferred as CS.No.240/2024 in Madras High Court, it is stated that I am claiming $1/5^{\text{th}}$ of the share then, but now since Mr. Kuppu Rao and Kasthuri Bai have passed away, now I am entitled to $1/3^{\text{rd}}$ of the suit property as per current situation.

Q17: I put it to you that you know very well that the suit property was given to Soorya Prakash through family arrangement and also for the construction with the consent of your husband and only being greedy to grab the suit property you have filed the plaint in CS 240/2024 and defending the TOS 68/2024.

A: I deny.

Time: 11.30 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