

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

T.O.S.No.46 OF 2022

Date: 28.11.2025

Time: 12.26 P.M.

Name : Mr.Sundarajan (PW3)

Cross Examination by Mr.R.Anish Kumar, Learned counsel for the defendant.

Solemnly Affirmed:

Q1: What is your name?

A: S.Sundarajan

Q2: Have you filed any document / aadhar card before this Court to prove your name?

A: Yes.

Q3: (Ex.P1 to Ex.P42 are shown to the witness) I put it to you that you have not filed any document to prove your name.

A: Yes, I have not filed.

Q4: I put it to you that you are not Sunderrajan and you come to this court to depose false evidence.

A: I deny.

Q5: Whether the deceased Mr.Venkatesan is your relative?

A: No.

Q6: How long years you worked with Mr.Venkatesan?

A: More than 10 years.

Q7: What is your nature of work with Mr.Venkatesan?

A: I worked as a driver.

Q8: What was your salary atlast?

A: Rs.18,000/-

Q9: What was your salary on 2019-2020?

A: Rs.15,000/-

Q10: Have you filed any proof for receiving salary from Mr.Venkatesan before this Court?

A: No.

Q11: Why you come to this Court?

A: To depose evidence regarding attesting the Will

Q12: Did you receive any summons from this Court to depose evidence?

A: No.

Q13: Who called you to this Court to depose evidence?

A: Mr.Ramachandran, i.e., petitioner's father.

Q14: What Mr.Ramachandran told you?

A: He told me that you say what you know regarding the Will.

Q15: What was the work of Mr.Venkatesan?

A: LIC and Post office agent.

Q16: I put it to you that he never had any income to give salary to you because he was an agent of LIC and post office.

A: I deny. Witness adds: His wife is a retired teacher.

Q17: Whether Mr.Venkatesan lived separately or along with his brother?

A: In the ground floor he lived separately.

Q18: (Ex.P1 Will is shown to the witness) I put it to you that the signature of the testator in the first page and in the next page are entirely different.

A: I deny. Witness adds: Both the signatures are the signature of Mr.Venkatesan.

Q19: I put it to you that he bought a car only in the year 2017 and before that he did not have a car.

A: I deny. Witness adds: He changed his car 3 times. I worked as a driver for all the 3 cars.

Q20: For what reason you met Mr.Venkatesan 3 times in hospital?

A: First time, I met on 11.05.2021 at the time I handed over his dresses and cell phones. Second time, I met on 14.05.2021 at the time he instructed me to collect one cover from Ganesan, Advocate. Then, I met third time I do not remember the date at that time I handed over the "Dharbai" of his wife for touching the same by Venkatesan and after that I handed over the same to his family members.

Q21: I put it to you that the Ex.P1 Will was never prepared by the testator, you and Ramachandran and his family members created this Will.

A: I deny.

Q22: I put it to you that you have come to this Court to help Mrs.Kaveri to get the property.

A: I deny.

Q23: (Ex.P1 Will is shown to the witness) Was any doctor present at the time when Mr.Venkatesan signed in the Ex.P1 Will?

A: No.

Q24: Whether you informed regarding the execution of the Will to doctor at the hospital?

A: I did not inform anything to the doctor.

Q25: Whether Mr.Venkatesan was in a sound state of mind while he executed the Ex.P1 Will?

A: Yes.

Q26: Do you know who is the other attesting witness in the Ex.P1 Will?

A: Mr.Baskaran, his attender.

Q27: Do you know the contents of the Ex.P1 Will when you signed in the Will?

A: I do not know.

Q28: Whether Mr.Venkatesan discussed anything regarding the execution of the Will when he was admitted in hospital?

A: No.

Q29: Do you know the siblings of Mr.Venkatesan?

A: Ramachandran and 2 sisters.

Q30: Do you know the name of the sisters?

A: I do not know.

Q31: Whether Mr.Venkatesan said anything about Mr.Ramachandran?

A: Yes, he said in a good manner.

Q32: I put it to you that nothing has happened as stated by you and you depose false evidence before this Court.

A: I deny.

Q33: I put it to you that Mr.Venkatesan did not sign in the Ex.P1 Will Hence, you have not filed any document to prove the same.

A: I deny.

Time: 01.05 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