

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

T.O.S.No.46 OF 2022

Date: 17.07.2025

Time: 02.35 P.M.

Name : Mr. Kaveri Ramachandran (PW1) Recall

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

Since Exhibits from Ex.P35 to Ex.P41 rearranged as Ex.P36 to Ex.P42.
Hence, for the documents referred in cross examination of PW1, dated
14.07.2025 the Exhibits are rearranged as Ex.P36 to Ex.P42.

Solemnly Affirmed:

Q50: (Ex.P42 is shown to the witness) Who is Bujji anna referred in the said photograph?

A: Mr.Thirumalai Kumar.

Q51: I put it to you that if the photographs in Ex.P36,38,39,40 and 42 are forwarded to you recently to your mobile model Moto G 75 5G as you claimed in your section 65(B) certificate and answer to the Q.No.27. Then, your photograph filed by you would have the latest date but the photographs all showing the date as 12.05.2021, 14.05.2021, 18.05.2021, 18.05.2021 and 21.05.2021 respectively. Therefore these are all fabricated photographs for the purpose of this suit. What do you say?

A: I deny.

Q52: Please see 65(B) certificates of Ex.P36,38,39,40 your statement in the 65 (B) certificate are different from the photographs marked under the said exhibits. What do you say?

A: I deny.

Q53: Please see your answer to the Q.No.25 can you name the photo studio where you printed the photographs Ex.P36,38,39,40 and 42?

A: Sri Krishna stores.

Q54: Have you produced any proof or bill to show that these photographs are printed Sri Krishna Stores?

A: No.

Q55: (Ex.P37 and Ex.P41 are shown to the witness) Please see Ex.P37 and 41 the address of the service provider are different. Is it right?

A: Yes.

Q56: (Ex.P37 and Ex.P41 are shown to the witness) Please see Ex.P37 and 41 the date of invoices are 13.05.2021 and 19.05.2021. Is it right?

A: Yes.

Q57: (Ex.P37 is shown to the witness) It says the invoices created using “my bill book” app. Is it right?

A: I do not know the bill was generated using the above said app.

Q58: I put it to you that this invoice Ex.P37 was created by using “my bill book” app.

A: I do not know.

Q59: Can you tell the date when this bill Ex.P37 was issued to you?

A: 14.05.2021.

Q60: I put it to you that this “my bill book app” was launched only on 21.07.2022.

A: I do not know.

Q61: I put it to you that you are not a genuine witness.

A: I deny.

Q62: I put it to you that the Ex.P36 to Ex.P42 marked under additional proof affidavit are all fabricated documents to cheat the Court.

A: I deny.

Q63: I put it to you that you have not approached this Court with clean hands and hence you are not entitled for the relief as prayed for

A: I deny.

Time: 03.06 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