

BEFORE THE ADDITIONAL MASTER-III  
HIGH COURT, MADRAS.  
C.S.No.23 OF 2023

Date : 10.04.2026  
Time : 11.57 A.M.

Name : Mr. B. Deenan (PW1)

Continuation of Cross Examination by Mr.S.Udhayakumar, for M/s.N.Manohar, Learned counsel for the defendant.

Solemnly Affirmed:

Q74: (Ex.P1 is shown to the witness) Is it right that is this a sale deed executed by the defendant to you?

A: I do not know to read Tamil.

Q75: (The signature of the purchaser in all the pages of Ex.P1 is shown to the witness) Is this your signatures?

A: Yes.

Q76: (Page No.4 of Ex.P1 is shown to the witness) Is it right that in Page No.4 of Ex.P1 the details of the DD No.798220, dated 14.12.2020 is mentioned?

A: I do not remember. The witness says I do not know to read Tamil. (The witness not willing to go through the Ex.P1 sale deed)

Q77: Did the defendant give any letter or undertaking to adjust Rs.52 Lakhs towards the sale consideration of the land in Madhavaram towards adjustment of the alleged loan amount?

A: No.

Q78: (Para 10 of the plaint is shown to the witness) You have stated in your plaint para 10 that the defendant gave undertaking to pay the balance amount Did the defendant give any letter or undertaking in written?

A: No. Witness adds: She is orally stated.

Q79: (Para 4 of the plaint is shown to the witness) You have stated in your plaint para 4 that the defendant will sell her flat situated at Kothari road, Nungambakkam and pay the balance amount. Did you ask the defendant to

hand over the original document of the flat as security?

A: No.

Q80: Have you seen the original document of the above said flat?

A: No.

Q81: Did you issue any notice to the defendant after April 2021 to pay the balance amount?

A: No

Q82: The defendant has filed a suit against you for permanent injunction in OS.No.6581/2021 only after filing of the suit you sent a legal notice on 14.07.2022 to pay the balance amount. Is it right?

A: I do not remember.

Q83: I put it to you that if really any balance amount is due by the defendant to you, you would have issued legal notice and also filed a suit immediately.

A: I do not remember.

Q84: From the date of execution of sale deed for Madhavaram land till filing of OS.No.6581/2021, dated 30.08.2021 there was no communication between you and the defendant. Is it not?

A: Yes.

Q85: (Para 12 of the plaint is shown to the witness) You have stated in your plaint para 12 that you have sent several whatsapp message to the defendant demanding her to settle the amount. Have you filed the whatsapp message before this Court?

A: I do not remember.

Q86: I put it to you that you never sent any whatsapp message to the defendant and now you falsely stated for the purpose of this case.

A: I deny.

Q87: I put it to you that if really you sent whatsapp message you would have filed the above said whatsapp message before this Hon'ble Court.

A: I do not remember.

Q88: (Para 11 of the plaint is shown to the witness) You have mentioned in

your plaint para 11 that in the suit OS.No.6581/2021 that the sale consideration for the land is only Rs.52,01,000/- is totally false.

A: I do not remember.

Q89: I put it to you that the defendant has clearly stated in the plaint in OS.No.6581/2021 that the value of the land in Madhavaram is not Rs.52,01,000/- but it is Rs.1,74,30,000/- But mistakenly the amount is mentioned in the plaint as Rs.1,76,87,000/-

A: I deny.

Q90: According to you the value of the Madhavaram property is Rs.52,01,000/- Is it not?

A: Yes.

Q91: I put it to you that you have wrongly stated that the value of the property is Rs.52,01,000/- and it is only a guideline value.

A: I deny.

Q92: I put it to you that the market value of the Madhavaram property is Rs.1,74,30,000/-

A: I deny.

Q93: (Ex.P8 is shown to the witness) I put it to you that only the first page of Ex.P8 is alone genuine and other pages annexed with this Ex.P8 is created for the purpose of this case.

A: My auditor knows. Witness adds: I do not know. Then, witness says I deny.

Q94: (Ex.P8 is shown to the witness) Is it right that the particulars stated in the other pages are not mentioned in the first page of Ex.P8 Income Tax Returns.

A: I do not know.

Time : 12.43 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