

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 03.12.2024

Time : 12.05 P.M.

Name : Mrs.Hema Srinivasan (PW1)

Age : 75 Years

Husband's Name : Mr.K.Srinivasan

Residential Address : 6N, Sanjivini Apartments, 72/1, L.B. Road,
Thiruvanniyur, Chennai 600 041.

PW1 Chief Examination by Mr.K.Balamurali, the learned counsel for the Plaintiff.

Solemnly affirmed:

I am the Plaintiff herein. I am filing my proof affidavit stating the facts of this case and the same may be treated as part and parcel of my examination-in-chief. The following documents are marked as exhibits.

Ex.P1 is the Original Will executed by A.Venkataraman dated 22.03.2022. (The document marked subject to proof and admissibility of the learned counsel for the defendants objection).

Ex.P2 is the computer generated Death Certificate of A.Venkataraman dated 05.09.2022.

Ex.P3 is the Sale Deed registered as Doc.No.253 of 1997 dated 09.04.1947 executed by T.K.Lakshmipathy and as guardian for his two minor sons, in favour of K.Arunachalam in SRO, T.Nagar. (Compared with original).

Ex.P4 is the Death Certificate of K.Arunachalam dated 05.04.1999. (Compared with original).

Ex.P5 is the Legalheirship Certificate of K.Arunachalam dated 19.10.2004. (Compared with original).

Ex.P6 is the Release Deed executed by 2nd and 3rd Defendants along with plaintiff registered as Doc.No.800 of 1986 in SRO T.Nagar in favour of first defendant and A.Backiayalakshmi and A.Venkataraman dated 18.08.1984. (Compared with original).

Ex.P7 is the extract from the Town Survey Land Register dated 23.03.2005. (Compared with original).

Ex.P8 is the Deed of Partition registered as Doc.No.984 of 2006 in SRO T.Nagar dated 19.04.2006. (Compared with original).

Ex.P9 is the print out of the Property Tax Assessment Order for Schedule Property dated 15.06.2022. (Section 63 of BSA produced).

Ex.P10 is the Circular issued by Commissioner of Revenue Administration regarding issuance of Legalheirship Certificate dated 09.08.2017. (The document marked subject to proof, admissibility and relevancy of the learned counsel for the defendants objection).

Ex.P11 is the print out of the Encumbrance Certificate for the period of 16.02.2006 to 28.10.2024. (Section 63 of BSA produced).

Ex.P12 is the printout of the Death Certificate of A.Backiyalakshmi dated 08.10.2022. (Section 63 of BSA produced).

Ex.P13 is the printout of the Guideline value of Immovable Property dated 13.10.2022. (Section 63 of BSA produced).

Ex.P14 is the printout of the Death Certificate of A.Ravi dated 17.04.2021. (Section 63 of BSA produced).

Ex.P15 is the photocopy of the Nomination given by second defendant to State Bank of India dated 18.06.2021.

Ex.P16 is the Pendrive containing the contents of the voice recordings of Late Venkatraman from his Mobile Phone along with section 63 BSA Certificate. (The document marked subject to proof, admissibility, and relevancy and regarding genuiness, disputing the contents, documents has no pleading of the learned counsel for the defendants).

Ex.P17 is the photocopy of the Legal Notice issued by the defendant counsel to the plaintiff's son dated 10.10.2022.

Ex.P18 is the Reply Notice issued to the Notice issued by the plaintiff's son with acknowledgment card dated 12.10.2022.

Ex.P19 is the true copy of the Legal Notice issued by the Plaintiff to the Defendants dated 20.10.2022.

Ex.P20 is the Reply Notice issued by the Defendants to the plaintiff counsel with acknowledgment card dated 29.10.2022.

Ex.P21 is the Rejoinder Notice from the defendant counsel to the plaintiff's counsel dated 21.11.2022.

Ex.P22 is the office copy of the Reply to the Rejoinder from the plaintiff to the defendant counsel in response to the reply notice dated 29.10.2022 dated 14.12.2022.

Ex.P23 is the Reply to the Rejoinder from the plaintiff to the defendant counsel in response to the Rejoinder dated 21.11.2022 Notice dated 29.10.2022.

Time: 12.50 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 - I

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 03.01.2025

Time : 03.00 P.M.

Name : Mrs.Hema Srinivasan (PW1)

PW1 Cross Examination by Mrs.Chitra Sampath, Senior Counsel for T.S.Baskaran, counsel for the Defendants.

Solemnly affirmed:

Q1: What is your educational qualification?

A: P.U.C. Pass.

Q2: What is the educational qualification of your sister Suseela?

A: S.S.L.C pass.

Q3: What is the educational qualification of your sister Padmini Rajaram?

A: S.S.L.C pass.

Q4: What is the educational qualification of your brother Venkatraman?

A: B.Sc., M.A.Economics., CAIIB, Costing, M.C.A., L.L.B., M.L.,.
He also registered himself as a Lawyer.

Q5: When did your brother acquire all these qualifications?

A: First he did B.Sc., When he was working in Bank he did CAIIB.
He did the remaining courses through Indira Gandhi Open University.

Q6: Can you recollect and tell when your brother Venkatraman acquired these qualifications?

A: I cannot say with certainty.

Q7: Was your brother Venkatraman employed in Syndicate Bank?

A: Yes. He worked there initially.

Q8: Did he continue with Syndicate Bank?

A: He was transferred several times and in order to take care of his mother he took VRS and stayed back in Chennai.

Q9: What is the qualification of your brother Subramaniam?

A: B.E. Civil Engineering.

Q10: What was your husband doing?

A: He has retired from Bank of Baroda.

Q11: How many children do you have?

A: I have 3 children. One son and two daughters. My son's name is Harikrishnan, One of my daughter is Sowmiya and she is no longer alive. Another daughter is Nirmal and she is in U.S.A.

Q12: Has your son Harikrishnan accompanied you to the Court today?

A: Yes.

Q13: Is the person sitting behind you is Harikrishnan?

A: Yes.

Q14: How many children does Padmini Rajaram have?

A: 4 daughters.

Q15: Where are they residing?

A: First daughter is in Australia and the remaining three are in U.S.A.

Q16: When Padmini Rajaram husband die?

A: He died during the COVID times. I do not recollect the exact year.

Q17: Till the death of her husband where did Padmini Rajaram reside?

A: Padmini Rajaram and her husband were residing in Bombay where they owned a Flat. Later, they were mostly staying with their daughters outside India. They had let out the property in Bombay.

Q18: How frequently Padmini Rajaram comes to Chennai to meet you?

A: She comes whenever it is possible for her and sometimes in a span of two years also.

Q19: When did you meet Padmini Rajaram last?

A: I met her at the time when ceremonies of my mother took place.

Q20: When did Suseela's husband Ravi die?

A: He also died during COVID times. I do not recollect the year.

Q21: Can you recollect and say whether Padmini Rajaram husband died first or Suseela's husband died first?

A: I do not remember.

Q22: What was husband of Suseela, Mr.Ravi was doing for his avocation?

A: He was an Interior Designer.

Q23: Are you aware whether Ravi had left any immovable property for Suseela?

A: I vaguely recollect that a landed property was there, in and around Kancheepuram. Witness Adds: Approximately 1 ground of land at Kattuppakkam was purchased in the name of Suseela by my brother Subramaniam.

Q24: Beside immovable property, what other assets were left for Suseela by her husband Ravi?

A: Ravi had purchased jewels for Suseela which were available with her. He had left some Mutual funds and shares.

Q25: Who informed you about the above details of property inherited by Suseela?

A: When Suseela and myself talk casually and she had informed me about it.

Q26: How old was your mother when she died?

A: She was 99 years old.

Q27: Do you remember the date of death of your mother?

A: 22nd September 2022.

Q28: Who was cooking for your brother Venkatraman and your

mother?

A: Till my mother was mobile she was cooking. Later when she was ailing, my sister Suseela used to bring cooked food from her house or cook at Venkatraman's place depending upon the requirement and convenience. Sometimes, Venkatraman used to cook for himself and he used to call me to know the receipe. I used to come once in a week and stay with my mother for a couple of days. At that time Suseela will bring food for us or I will go and eat in the house of Suseela.

Q29: Is it correct to state that Venkatraman's three middle toes of the left leg had been amputated?

A: Yes. Witness Adds: It is because of sugar complaint.

Q30: Do you recollect when the amputation was done to Venkatraman?

A: It must be about an year or months prior to his death.

Q31: Did Venkatraman was diagonised with heart disease?

A: Yes. Witness Adds: Initially he was found to have diabetes. Family doctor Nandakumar diagonised Venkatraman has Heart problem. I regualarly consult Dr.Ayyappan in BSS Hospital. On the advise of Nandakumar my son took Venkatraman for treatment to Dr.Ayyappan.

Q32: Can you recollect and say the month and year of the above diagnosis to Venkatraman?

A: It was all in the span of one year prior to his death.

Q33: Is it correct to state that Venkatraman was affected by

COVID?

A: No.

Q34: What is the educational qualification of your son Harikrishanan?

A: B.Sc., M.B.A., from Madras University.

Q35: Where was he employed and where is he employed now?

A: Initially he was working in some Software companies. Presently he is working for Accenture.

Q36: Is it correct to state that your son Harikrishnan has a passion for drawing and painting?

A: Yes. Witness Adds: He is not presently doing any art work.

Time: 03.45 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 23.01.2025

Time : 03.35 P.M.

Name : Mrs.Hema Srinivasan (PW1)

PW1 Cross Examination Continuation by Mrs.Chitra Sampath, Senior Counsel for T.S.Baskaran, counsel for the Defendants.

Solemnly affirmed:

Q37: For how long your son has been working in Accenture?

A: I do not know. He has changed his job now.

Q38: Is it correct to state that your sister Susila and her husband Ravi residing in the first floor of the house of your brother Subramaniam for around 10 years prior to the death of Ravi?

A: They were living there for a quite long time after the death of Ravi Susila continued to live there.

Q39: The first year anniversary of Ravi was celebrated at which place?

A: I do not remember.

Q40: When your brother Venkatramam died were you in Chennai?

A: No. I was in U.S.A.

Q41: Do you recollect as to whether the subhasweegaram ceremony of Ravi was celebrated at home or elsewhere?

A: I do not recollect.

Q42: Is your brother Venkatraman proficient in English?

A: Yes. He is proficient in English.

Q43: Is your brother Venkatraman holding certificate of practice from the institute of Company Secretaries of India?

A: Yes.

Q44: How many cell phones your brother Venkatraman had?

A: More than one. I do not know how many.

Q45: Do you have a mobile with you?

A: Yes.

Q46: How many numbers of your brother Venkatraman you have stored in your mobile?

A: I was having several numbers of my brother, After enquiring with him I noted a number as present number (Pr).

Q47: Is it correct that your brother Venkatraman had appointed his brother Subramaniam as nominee for his Bank Account with ICICI Bank at T.Nagar?

A: Yes. But I do not know.

Q48: Is it correct that after the death of Venkatraman, Subramaniam received the amount from ICICI Bank and distributed the same among his 3 sisters and himself?

A: Yes.

Q49: When did you get knowledge about the alleged Will of Venkatraman?

A: I came to know about the Will on the date of execution, 22.03.2022 when my son brought the Original Will and handed it over to me.

Q50: Did you disclose the existence of the alleged Will of Venkatraman immediately after his demise to your brother and sisters?

A: I did not disclose it at that time.

Q51: Ex.P17 is shown to the witness. Are you able to read and understand the contents of Ex.P17?

A: It will take some time for me.

Q52: Ex.P17 is shown to the witness. Is it correct that this is the notice issued by your brother Subramaniam to your son Harikrishnan asking for copy of the alleged Will?

A: Yes. I was made to understand that I should not disclose or furnish a copy of the Will before getting an order of probate from the Court. So I did not give a copy.

Q53: Where was the funeral ceremonies of your brother Venkatraman performed?

A: I am not able to recollect correctly. It may be at Gnanavyabi near Bogg Road, T.Nagar.

Q54: Who performed the ceremonies of your brother Venkatraman?

A: My brother Subramaniam.

Q55: Are you familiar with the signature of your brother Venkatraman?

A: I know it to an extent.

Q56: Will your brother Venkatraman sign his full name with all alphabets decipherable in the signature?

A: Yes. The entire letters in his name is readable in his signature.

Q57: When did you see him affixing his signature in any paper?

A: There was no occasion for me to get signature from my brother Venkataraman.

Q58: Proof Affidavit is shown to the witness. In para 20 you have mentioned that your brother Venkatraman was giving Rs.10,000/- per month to his sister Suseela. For how long and till what date was your brother paying the said sum to your sister Suseela?

A: My brother Venkatraman might have helped her even before the death of her husband Ravi. He has been taking care of her including her medical needs till he died.

Q59: Is it correct that your sister Padmini Rajaram had been paying money to your mother for her expenses till she died in 2022?

A: No.

Q60: Do you know who is having custody of all the cellphones of your brother Venkataraman?

A: I do not know.

Q61: Do you know what type of phone he was using?

A: He was using an Android Phone and the last one was One Plus One to which number I used to call.

Q62: What is the door number of the house of your brother Venkataraman?

A: Old No.20/1, New No.22/1.

Q63: Since when the new number was brought?

A: I think the new number was given after the entire house was demolished and reconstructed.

Q64: Was your brother Venkataraman actively working as a Company Secretary till he died in 2022?

A: Yes.

Q65: Is it correct that he had lot of books, notebooks, letter pads, plain sheets at his house?

A: Yes. It is correct. Witness Adds: He also had a printer.

Q66: What did your son tell you when he handed over the alleged Will to you?

A: He only asked me to keep it inside.

Q67: How many members are there in your house today?

A: 5 members.

Q68: Can you give the names?

A: My husband Sreenivasan, Son Harikrishnan, Daughter-in-law Srividhya, my grand daughter Prakrithi.

Q69: Can you say who all attended the annual ceremonies of Mr.Ravi from your house?

A: I do not know.

Q70: Is it correct to state that Gaya Srartham has to be performed according to the Hindu Shastras for the departed soul?

A: It will be done by the persons of their own choice.

Q71: Do you have any objection for the performance of Gaya Srartham by Subramaniam for his brother Venkatraman and mother Baghyalakshmi?

A: I do not know whether they did. But I do not have objection for performing Gaya Srartham.

Time: 04.25 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 31.01.2025

Time : 12.48 P.M.

Name : Mrs.Hema Srinivasan (PW1)

PW1 Cross Examination Continuation by Mrs.Chitra Sampath, Senior Counsel for T.S.Baskaran, counsel for the Defendants.

Solemnly affirmed:

Q72: Ex.P6 is shown to the witness. Can you say what is this document?

A: This is a document which I executed at T.Nagar Registrar Office releasing my rights.

Q73: Do you know who prepared this document?

A: My brothers would have done it.

Q74: Do you say that you do not know who prepared it?

A: I am sure that it was made ready by my brothers.

Q75: Ex.P8 is shown to the witness. What is this document?

A: I am not in a position to understand this document.

Q76: In Ex.P8 at page 11 have you signed as a witness?

A: Yes. I signed.

Q77: In Ex.P8 is it correct that the other witness is Ravi husband of your sister Suseela?

A: Yes.

Q78: In Ex.P8 who all has signed?

A: My mother Bakkiyalakshmi, My brother Venkatraman and My other brother Subramanian.

Q79: Ex.P14 is shown to the witness. What is this document?

A: It is the death certificate of Ravi, husband of my sister Suseela.

Q80: What is his date of death?

A: 31.03.2020.

Q81: Ex.P15 is shown to the witness. What is this document?

A: My sister Suseela had a Bank Locker with State Bank of India she had nominated my brother Venkatraman and later my mother Backiyalakshmi. She had removed them and then nominated my son Harikrishnan.

Q82: Is it correct that Ex.P15 is a xerox copy?

A: Yes.

Q83: From where did you get this xerox copy?

A: My brother Venkatraman had effected the change in the nomination and had forwarded a copy to me in my mobile through Whatsapp.

Q84: Do you have that mobile phone of your brother as well as yours which contains the above whatsapp message?

A: I have my phone which is left at home. I do not remember my brother's mobile number. We have the custody of my brother's mobile also.

Q85: How many mobile of your brother Venkatraman is with you?

A: Only one is available.

Q86: In Ex.P15 do you know in whose handwriting the form has been filled up?

A: Brother Venkatraman has filled up the details.

Q87: I put it to you that Ex.P15 is a forged document?

A: I deny.

Q88: Ex.P16 is shown to the witness. What do you know about Ex.P16?

A: It is a recording of Venkatraman made by himself in his mobile which we have copied in pendrive.

Q89: Who is having the custody of mobile containing the recording?

A: Its with us.

Q90: Who copied the contents on to the pendrive in Ex.P16?

A: It was done by my son Harikrishnan.

Q91: Who has accompanied you to the Court today?

A: My daughter-in-law Srividya.

Q92: I put it to you that Ex.P16 is a fraudulent document?

A: I deny.

Q93:What is the dispute between you and your brother Subramaniam?

A: At the time when my mother passed away, my sister Padmini who was staying with my mother then called me over phone. On coming to know of the same I came along with my son to see my mother. When I entered into the house of Venkatraman my brother Subramaniam used unparliamentary language towards me and my son and shouted whether I had come to stake a claim in the property and was having a spanner in his hand. And watchman named Joseph from adjoining property joined issue with Subramaniam came to attack my son Harikrishan therefore we were forced to leave the place. From then onwards we have not been on talking terms.

Q94: Do you have any disputes with your sisters Padmini and

Suseela?

A: After the death of my mother when they came to know that the property has been given to me they became unhappy about it. Now I am not on talking terms with my sisters.

Q95: In response to Q.No65 you had admitted that deceased Venkatraman had lot of books, notebooks and letter pad and plain sheet at his house. Have you and your son Harikrishnan removed it from the house of Venkatraman?

A: No.

Q96: Can you recollect and say from when your mother needed assistance for her daily routines?

A: My mother was fairly capable of walking with her walker. The maid who was working in the house helped her for her regular routines.

Q97: Do you know D.Ramesh?

A: Yes.

Q98: How do you know?

A: Family friend of my son, my husband and myself everybody knows. He is residing in Thirvanmiyur.

Q99: Where is he employed?

A: I do not know.

Q100: What is his educational qualification?

A: I know he has got two degrees.

Q101: Since how long you are acquainted with D.Ramesh?

A: I know him for several years.

Q102: How often he comes to your house?

A: Whenever he gets time he will drop in.

Q103: How many members are there in his house?

A: He lives along with his wife and two children.

Q104: Is it correct that D.Ramesh will not fail to come atleast once a week?

A: He will come only when time permits or on occasions.

Q105: Have you travelled together with Ramesh along with your family?

A: We have gone out together to Coimbatore when my daughter was visiting us.

Q106: Can you recollect which year?

A: I must be more than 5 to 10 years.

Q107: How does D.Ramesh call you?

A: He would not specifically address me by any name.

Q108: What is his age?

A: He may be around 47 to 50.

Q109: Does he own a vehicle?

A: Yes. He has a Two wheeler and four wheeler.

Q110: Have you visited D.Ramesh house?

A: I have visited him.

Q111: How old is your son Harikrishnan?

A: He is born on 03.10.1973.

Q112: Is it correct that Harikrishnan and D.Ramesh are of the same

age group and they go out together?

A: They go out together but not frequently.

Q113: Have you met the father and mother of D.Ramesh?

A: I have met them but they are not alive today.

Q114: How many sibling has D.Ramesh?

A: I remember only an elder brother of D.Ramesh who died along with his parents in an accident. It was around 4 to 5 years back.

Time: 01.45 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 21.04.2025

Time : 02.50 P.M.

Name : Mrs.Hema Srinivasan (PW1)

PW1 Cross Examination Continuation by Mrs.Chitra Sampath, Senior Counsel for T.S.Baskaran, counsel for the Defendants.

Solemnly affirmed:

Q115: Is there any maid in your younger brother Venkatraman house for a quite long time even prior to his death. Do you know her name?

A: I think that she must be there for around 7 to 8 years prior to the death of Venkatraman. She is called as “Aaya”. I do not know her name.

Q116: Whether she is still working in the house of your brother Venkatraman?

A: Yes.

Q117: Were there tenants in the property of Venkatraman even during his life time?

A: Yes. There were two tenants in the first floor and one tenant in the second floor.

Q118: Have you or your son removed any of the belongings of your brother Venkatraman after his death from his house?

A: No.

Q119: Are you aware of the details of the types of Books read by your brother Venkatraman?

A: He had religious books and stotra books. He used to buy me stotra books also. Since he is in the field of Company Secretary he had books relating to that and also books related to law.

Q120: Has your brother Venkatraman informed you that you will be given the property belonging to him?

A: My brother and my mother had been telling me for very many years that I alone should inherit the property of Venkatraman as he had remained unmarried and I should not reveal this to anyone.

Q121: What is the reason for preferring you among the three sisters of Venkatraman?

A: The property was under a mortgage with one Sundaram Iyer at the time of death of my father. The said Sundaram Iyer one day come to the house of Venkatraman after the death of my father and insisted that his dues to be discharged immediately failing which he will bring the properties for sale. My husband took initiative as my brothers were young and he collected the savings from my mother and also some amount in my name given by my father to a third party, LIC amount in the name of my mother and bargained with Sundaram Iyer for reduction of interest and he redeemed the mortgage from Sundaram Iyer. My brother and mother were always grateful to my husband for saving the property. They were treating my son as their son and felt that the property should go to my son through me.

Q122: Has Subramaniam your brother manipulated any document with reference to any of the issues relating to you, your family, your parents, your brothers and sisters?

A: No.

Q123: Can you recollect and say that the first year ceremony of Ravi, the husband of your sister Suseela was celebrated on 22nd March 2022 at the house of Venkatraman?

A: I am not in a position to recollect.

Q124: During the time of Corona, when Venkatraman underwent the surgery of removal of three toes who assisted him?

A: My son went on my behalf. I didn't go.

Q125: I put it to you that you have fabricated a fraudulent and forged Will marked as Ex.P1 with an intention to grab the entire property of Venkatraman to the exclusion of the respondents herein?

A: I deny.

Time: 03.15 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 18.06.2025

Time : 02.30 P.M.

Name : Mr.D.Ramesh (PW2)

Age : 49 Years

Father's Name : Mr.L.E.Dayalan

Residential Address : 1B, Block 3, Thiruveni Apartments,
No.29, Kuppam Beach Road, Thiruvanniyur,
Chennai – 600 041.

PW2 Chief Examination by Mr.K.Balamurali, the learned counsel for the Plaintiff.

Solemnly affirmed:

Q1: What is your name?

A: D.Ramesh.

Q2: Ex.P1 is shown to the witness. Is this your signature?

A: Signature found in the attesting witness of the Ex.P1 is my signature.

Q3: Whose signature is there above the signature of the Testator in the Original Will?

A: It is the signature of the person who has written the Will.

Q4: Who signed as the second attesting witness?

A: It is the signature of Harikrishnan.

Q5: Do you know the contents of the Will?

A: At the time of signing the Will it mentioned as Will.

Q6: How was the health and state of mind of Venkatraman?

A: He was in normal state of mind.

Q7: In whose presence Venkatraman signed in the Will?

A: In the presence of myself and Harikrishnan.

Q8: Affidavit of attesting witness is shown to the witness. Is this your signature?

A: Yes.

Time: 02.50 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 12.09.2025

Time : 01.10 P.M.

Name : Mr.Harikrishanan Srinivasan (PW2)

Age : 51 Years

Father's Name : Mr.K.Srinivasan

Residential Address : No.3A, Sankara, 11/1, 6th Street,
Dr.Subbarayan Nagar, Kodambakkam,
Chennai – 600 024.

PW3 Chief Examination by Mr.K.Balamurali, the learned counsel for the Plaintiff.

Solemnly affirmed:

Q1: What is your name?

A: Harikrishnan Srinivasan.

Q2: Ex.P1 Will is shown to the witness. Whose signature is this?

A: Second witness signature is my signature.

Q3: Whose signature is there above the signature of the Testator in the Original Will?

A: It is my uncle Venkatraman's signature.

Q4: Who signed as the first attesting witness?

A: It is my friend Ramesh.

Q5: Do you know the contents of the Will?

A: Yes.

Q6: How was the health and state of mind of Venkatraman at the time of execution of Ex.P1 Will?

A: He was healthy and of sound mind.

Q7: In whose presence Venkatraman signed in the Ex.P1 Will?

A: Mr.Ramesh and in my presence.

Q8: Were you and first attesting witness Ramesh present at the time of Venkataraman signing in the Will?

A: Yes. Myself and Ramesh were present.

Time: 01.15 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I

BEFORE THE ADDITIONAL MASTER I,
HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 23.03.2026

Time : 02.35 P.M.

Name : Mr.D.Ramesh (PW2)

PW2 Cross Examination by Mrs.Chitra Sampath, the learned counsel for the Defendants.

Solemnly affirmed:

Q1: Are you employed anywhere?

A: Yes. I work as a Vice-President in A.D.P. India Private Limited.

Q2: Since how long you know the family of Hema Srinivasan?

A: For last 25 years.

Q3: Were you residing at Mandaiveli?

A: No. I was residing at Foreshore Estate.

Q4: At that time where was Hema Srinivasan residing?

A: Mandaiveli.

Q5: Is it correct that you were acquainted with Hema Srinivasan and her family since then or earlier?

A: Since last 25 years.

Q6: Is it correct that you had travelled with Hema Srinivasan Family to several tourist places?

A: Not several places but only few places.

Q7: Do you have the contact number of deceased Venkatraman?

A: No, I do not have.

Q8: Where were you working in the month of March 2022?

A: Same Company as of now.

Q9: When did you meet the Testator Venkatraman for the first time?

A: 25 years before.

Q10: How many members are there in family of Venkatraman. Can you give their names?

A: As far as I know Venkatraman was a single person. His mother was living along with him.

Q11: Is it correct that you had not got an occasion to meet the siblings of Late Venkatraman?

A: No.

Q12: Was it a holiday on the day you signed Ex.P1 Will?

A: No, it was not a holiday.

Q13: Can you recollect and say what was the day of the week on the date of Ex.P1 Will?

A: I am not sure about the day of the week but it must be Wednesday or Thursday.

Q14: Are you aware what were the health issues that was faced by Late Venkatraman?

A: Yes. He was a High Diabetic and because of it he had to undergo amputation of his toes.

Q15: Can you recollect and say at what time of the day you had signed Ex.P1?

A: It was around Noon.

Q16: Can you specify the time?

A: It was around 12.00 PM to 01.00 PM.

Q17: Who was present along with you at the time you signed Ex.P1?

A: At the time when I signed, Mr.Venkatraman was there and his mother and my friend Hari Krishnan.

Q18: Do you know the qualification of Late Venkatraman?

A: Yes. He was a Company Secretary and he had also finished Law, besides other degrees.

Q19: Are you aware that Late Venkatraman was good at English?

A: Yes.

Q20: Did you read the Ex.P1 Will before signing?

A: Yes.

Q21: Did you find any mistake in the English Grammar in Ex.P1?

A: I do not recollect.

Q22: Is it correct that you had not pointed out the mistakes in English found in Ex.P1?

A: Yes.

Q23: Are you aware who had drafted and who had typed Ex.P1 Will?

A: I am not aware.

Q24: Can you recollect and say at what place of the house of Late Venkatraman you had sat for signing Ex.P1?

A: Hall.

Q25: Do you know the Door Number of House of Late Venkatraman?

A: No.

Q26: Who invited you to the house of Late Venkatraman?

A: Hari informed me that his Uncle Venkatraman asked me to visit the house.

Q27: On the date of Ex.P1 was there any function that was performed in the house of Late Venkatraman?

A: I was not aware.

Q28: Did you go to the house of Late Venkatraman on your own or along with Hari?

A: Along with Hari.

Q29: Did you both leave the house Late Venkatraman together or separately?

A: Together.

Q30: From the house of Late Venkatraman did you go to the house of Harikrishnan?

A: No.

Q31: When did you last see the Ex.P1 Will?

A: On the date of me signing the Will.

Q32: Have you visited the house of Hema Srinivasan after signing Ex.P1 Will?

A: Yes.

Q33: Have you discussed or informed Hema Srinivasan about what transpired on the date of Ex.P1?

A: I did not discuss anything about Ex.P1 Will with Hema Srinivasan.

Q34: Is there any particular reason for not informing Hema Srinivasan about Ex.P1 Will?

A: No specific reason.

Q35: Do you know when the mother of Late Venkatraman died?

A: September 2022.

Q36: What is the name of the mother of Late Venkatraman?

A: I do not know.

Q37: On the date of your visit to the house of Venkatraman did you find any Maid in the house?

A: I do not see any one. I do not recollect.

Q38: Did Late Venkatraman provided with any Coffee or Tea or any snacks as a token of thanks for being the witness to Ex.P1 Will?

A: No.

Q39: Besides the removal of toes was there any other health issue with Late Venkatraman?

A: I am not aware.

Q40: Did Late Venkatraman inform you the reason for choosing you as a witness to Ex.P1 Will?

A: Since he knows me, he asked me to sign.

Q41: Do you know who are the close friends of Late Venkatraman?

A: No.

Q42: Have you come across the signature of Late Venkatraman in Bank Documents and Certificates issued by Late Venkatraman as a Company Secretary?

A: No.

Q43: Have you entered the office room of Late Venkatraman during his life time?

A: No. I always met him at his home. I am not aware about where his Office is.

Q44: Are you aware as to whether he had employed a Typist, had a typewriter and printer at home?

A: No, I am not.

Q45: Do you know as to whether Late Venkatraman is capable of typing all his documents by himself?

A: No, I am not aware.

Q46: Had you taken a day off from your official duties on the date of Ex.P1?

A: No.

Q47: What is your Office timings?

A: 09.30 AM to 06.30 PM.

Q48: Where is your Office located, give the address?

A: Located in Guindy. Tamarai Tech Park, Industrial Estate, Guindy.

Q49: How much time did you spend at the house of Late Venkatraman on the date of Ex.P1?

A: Less than an hour.

Q50: Ex.P1 Will is shown to the witness. Can you deny the fact that that Door Number of the house of Late Venkatraman is wrongly typed as 20 instead of 22?

A: I do not know.

Q51: Was there any discussion regarding registration of Ex.P1 Will?

A: No.

Q52: I suggest to you that the signature found in Ex.P1 is not that of Late Venkatraman?

A: I deny.

Q53: I suggest to you that you and Hari had fraudulently manipulated to create Ex.P1 to grab the properties of Late Venkatraman.

A: I deny.

Q54: I suggest to you that you and Hari had used an old letter head of Late Venkatraman to forge Ex.P1 Will.

A: I do not know whether it is old or new.

Q55: Did Late Venkatraman inform you that he had taken legal advise to prepare Ex.P1?

A: No, he did not say anything.

Q56: I suggest to you that you are coming and giving false evidence at the request of your friend Hari and the family of Hema Srinivasan?

A: I deny.

Re-examination: No.

Time: 03.15 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I

BEFORE THE ADDITIONAL MASTER I,

HIGH COURT, MADRAS

T.O.S.No.39 of 2023

Date : 23.03.2026

Time : 03.17 P.M.

Name : Mr.Harikrishanan Srinivasan (PW3)

PW3 Cross Examination by Mrs.Chitra Sampath, the learned counsel for the Defendants.

Solemnly affirmed:

Q1: Did you accompany your mother Hema Srinivasan on the first day of her cross examination before this Court?

A: Yes.

Q2: Is it correct that subsequent hearings your mother Hema Srinivasan was accompanied by your wife when she was being cross examined before this Court?

A: Yes.

Q3: Have you gone through the evidence given by your mother Hema Srinivasan as PW1?

A: Yes.

Q4: Can you remember which day of the week was Ex.P1 Will executed?

A: It is dated 22nd March 2022. I do not recollect but it could be Wednesday.

Q5: At whose request your friend Ramesh signed Ex.P1 Will?

A: At the request of my uncle Venkatraman.

Q6: Who informed about the request made by your uncle Venkatraman?

A: I requested Mr.Ramesh to come the next day because Vengutu mama had requested his presence.

Q7: What time of the day you were at the house of your Uncle?

A: It was around noon.

Q8: In which part of the house you were sitting?

A: I was sitting in the hall, left of Venkatraman.

Q9: Who were present at that time?

A: My patti was present. Myself, Ramesh and my uncle.

Q10: Did Ramesh take off from his official work on that day?

A: I do not know about that.

Q11: Did both of you go together to the house of Venkatraman or separately?

A: Yes.

Q12: Did you leave together?

A: Yes.

Q13: Did you take him to your house after signing Ex.P1?

A: No. I dropped him at his house.

Q14: Is it correct that your Uncle was running an office from his house?

A: I am not sure whether Uncle had a separate office. He was a Company Secretary and was working with several people and visiting many offices.

Q15: Did he have a Typist, Typewriter and a Printer at home?

A: He did not have a Typist and a Typewriter. But had a Printer.

Q16: Does your uncle prepares the certificates which he gives as a Company Secretary on his own by typing it himself or outsources it?

A: I am not involved in his business.

Q17: Does your uncle Venkatraman adopts different signature for his various activities?

A: I do not know.

Q18: Do you have custody of documents signed by Venkatraman in the last three years prior to his death?

A: No.

Q19: Is it correct to say that as per your answer to the Q.No.18 you do not have custody of any document containing the signature of Late Venkatraman in three years prior to his death?

A: I do not have any physical copies of any of the documents. After Ravi chitappa died, Mama made me the nominee for my Chithi. In that he put his signature as a witness.

Q20: What do you mean by you do not have physical copies. Does it mean you have soft copies?

A: I have the land documents as physical copies after his death.

Q21: Do you have copies of documents containing the signature of Venkatraman in physical form or by way of soft copies for the period of three years prior to his death?

A: I did not have any of the soft copies or physical copies. My mother had soft copies of documents.

Q22: What were the documents your mother had as soft copies?

A: Only the document nominating me on behalf of Chithi. Witness

Adds: We were made aware of this document only after the Court case and it was taken from the Archives of the mobile phone of my mother.

Q23: Is your Uncle Venkatraman proficient in English?

A: He is very proficient.

Q24: Is it correct to say that your Uncle Venkatraman is perfectionist?

A: He is not a perfectionist. Witness Adds: When I scored 1 out of 100 in my 12th standard and was nobody, he took pains to coach me to secure higher marks in a matter of two months. He taught me till 12 o clock at night and he has to walk home from Mandaiveli to T.Nagar because there was no bus. He was like a father to me.

Q25: Do you know who drafted Ex.P1 Will?

A: It was written by my uncle himself.

Q26: Who typed it?

A: I do not know. He had a written copy in his hand.

Q27: When did he inform you about preparing a Will?

A: Across the last 5 to 6 years prior to his death Paati and Vengatu mama had been continuoulsy telling me that finally his properties will be inherited only by me. Even at the time of construction of the house property in my mother's name was sold by Ravi Chithappa without informing my mother so, when my mother asked Venkattu mama, he told my mother and myself all his properties will come to us. Witness Adds: I had given a loan to my uncle Subramaniam that he will refund Rs.1,50,000/- for my house interiors. But when I

asked for that, my uncle was in receipt of share amount of Rs.10,00,000/- but he refused to pay as he said share is different and the money borrowed from me is different and when I asked it is the same money, he abused my wife with unparliamentary words. After that I told him to keep the money and stopped speaking to him for more than 10 years. For me dignity and self respect is more important than wealth.

Q28: What is the door number of the house of Late Venkatraman?

A: It was No.20/1. Now it is 21/1.

Q29: Since when the door number has changed?

A: I am not aware.

Q30: Are you in good terms with your Chithi Suseela and Padmini at present?

A: They do not talk to me but I do not have any hatred towards them.

Q31: When the relationship between you, your mother got strained with your chithis Suseela and Padmini?

A: It is after my uncle Subramaniam started the case. Witness Adds: I tried talking to my chithi and provide her financial help, as she had problem in both knees but she refused to talk with me.

Q32: Do you remember when Ravi, husband of Suseela die?

A: He died one year prior to Vengutu Mama's death.

Q33: Was the first year ceremony of Late Ravi performed?

A: I am not aware.

Q34: Were you not invited to participate in the first year annual ceremony of Late Ravi by your Chithi Suseela?

A: I do not remember.

Q35: Did your mother Hema Srinivasan attended first year annual ceremony of Late Ravi?

A: I do not recall. Witness Adds: I worked as a Vice President at Accenture for sale and solutioning and handled business to the tune of 2.5 billions dollars per year. My work was sometime 24/7 and there are times that I have to be at office because of the responsibility assigned to me. This meant I cannot be available for everything.

Q36: Did Ramesh your friend attend the funeral of your Uncle Vengutu?

A: He visited Vengutu mama at his house on the next day of his death along with me.

Q37: Were you available in Chennai on the date of death of your uncle Vengutu?

A: I was at Coimbatore when my chithi called me first to inform Vengutu mama was lying on the bed with his mouth open and she was very frightened. So, I called ambulance from Coimbatore to attend on him. Though Subramani mama and mami were next door, chithi chose to call me.

Q38: Is it correct that your friend Ramesh chose to visit your uncle Vengutu only after your return from Coimbatore?

A: I asked him to wait for me.

Time: 04.11 P.M

Taken down in open Court, read over and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER – I