

NO. DF-19-15178

DEEPA CHINTAM A/K/A DEEPA	§	IN THE DISTRICT COURT
ADEMA,	§	
	§	
Plaintiff,	§	
	§	
VS.	§	DALLAS COUNTY, TEXAS
	§	
BHOOMANNA CHINTAM,	§	
	§	
Defendant.	§	256TH JUDICIAL DISTRICT

ORAL AND VIDEOTAPED DEPOSITION OF

BHOOMANA CHINTAM

APRIL 9, 2021

VOLUME 1

ORAL AND VIDEOTAPED DEPOSITION of  
 BHOOMANA CHINTAM, produced as a witness at the  
 instance of the Plaintiff, and duly sworn, was taken  
 in the above-styled and numbered cause on the 9th of  
 April, 2021, from 9:16 a.m. to 5:58 p.m., before Kathy  
 E. Weldon, CSR in and for the State of Texas, reported  
 by machine shorthand, at the offices of O'Neil  
 Wysocki, P.C., 5323 Spring Valley Road, Suite 150, in  
 the City of Dallas, County of Dallas, State of Texas,  
 pursuant to Notice and the Texas Rules of Civil  
 Procedure.

1 A P P E A R A N C E S

2 FOR THE PLAINTIFF:

3 Mr. Jason B. Freeman  
4 FREEMAN LAW. PLLC  
5 7011 Main Street  
6 Frisco, Texas 75034  
7 214.984.3410  
8 214.984.3409 (fax)  
9 Jason@freemanlaw.com

10 FOR THE DEFENDANT:

11 Ms. Jennifer Wright Satagaj  
12 O'NEAL WYSOCKI, P.C.  
13 5323 Spring Valley Road  
14 Suite 150  
15 Dallas, Texas 75254  
16 972.852.8000  
17 214.306.7830 (fax)  
18 Jennifer@OWLawyers.com

19 ALSO PRESENT:

20 Mr. Tony McGough, Videographer

21  
22  
23  
24  
25

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2

(Deposition Exhibit Nos. 1 through 28

3

were marked.)

4

THE VIDEOGRAPHER: We're on the record at

5

9:16 a.m. Today's date is April the 9th, 2021. This

6

is the video deposition of Bhoomanna Chintam.

7

BHOOMANA CHINTAM,

8

having been first duly sworn, testified as follows:

9

EXAMINATION

10

BY MR. FREEMAN:

11

Q. Mr. Chintam, can you state your full name for

12

the record?

13

A. Bhoomanna Chintam.

14

Q. Okay. Mr. Chintam, my name is Jason Freeman.

09:17:50 15

I represent Deepa Adema, also known as Deepa Chintam.

16

Do you understand that you're here today

17

in connection with a lawsuit between Ms. Adema and

18

yourself?

19

A. Yes.

20

Q. Okay. Have you ever participated in a

21

deposition before?

22

A. Yes. With you.

23

Q. Okay. How many depositions have you

24

participated in?

25

A. Two depositions.

09:18:13 1 Q. Two deposition?

2 A. Yeah.

3 Q. When were those?

4 A. I don't remember.

5 Q. Okay.

6 A. Probably '18 or '17. '18, '19. After my  
7 divorce, so --

8 Q. Okay. What did those involve?

9 A. Related to a civil case.

10 Q. Okay. What civil case?

11 A. That's -- that's a company -- related to the  
12 company.

13 Q. And what company is that?

14 A. Vectra Infosys, Inc.

09:18:54 15 (Reporter clarification.)

16 Q. (By Mr. Freeman) Okay. So you were involved  
17 in a -- you had your deposition taken in a lawsuit  
18 involving Vectra Infosys, Inc.?

19 A. Yes.

20 Q. Okay. What other lawsuit did you have your  
21 deposition taken in?

22 A. The other one, similar to the Court -- the  
23 Judge gave a judgment to you. I think you are the one  
24 who made that case. You -- you guys mixed up all  
25 cases, like a civil case, family case.

09:19:20 1 Q. Uh-huh.

2 A. So then the family case got -- the Judge gave  
3 us a ruling to close that, so I think that was another  
4 deposition.

5 Q. All right. Are you referring to your -- your  
6 testimony in -- during that proceeding?

7 A. Yes.

8 Q. Okay. Have you ever given testimony in any  
9 other matter?

10 A. No.

11 Q. Okay. Do you understand that you're here  
12 today under oath?

13 A. Yes.

14 Q. Okay. And you understand that it's a crime  
09:19:53 15 to lie under oath?

16 A. Yes, of course.

17 Q. Okay. I'll just give you a few ground rules.  
18 I know you've -- you've had your deposition taken a  
19 few times, but just a few ground rules.

20 If I ask a question, if you will, let  
21 me -- let me complete the question before you answer  
22 it. It just helps everyone keep a clean record.

23 When you give an answer -- and this is a  
24 good tie-in to it. When you give an answer, if you  
25 will, please, give a verbal response so that we can --

09:20:23 1 it helps the court reporter ensure we have a record.

2 If I ask a question that you don't  
3 understand, if you will, please just let me know.

4 A. Okay.

5 Q. And -- and with that understanding, I'd ask  
6 is it -- is it fair that if you do not tell me that  
7 you don't understand a question, we can assume you  
8 understand it?

9 A. I will ab- -- absolutely tell if I don't  
10 understand.

11 Q. Okay.

12 A. Yeah.

13 Q. Okay. Mr. Chintam, at any time if you need  
14 to take break, just let me know. You need a drink,  
09:20:56 15 use the restroom, no problem. I will probably just  
16 ask that if there's a question on the table, that you  
17 answer that question.

18 A. Sure.

19 Q. And then we can take a break any time you  
20 need.

21 A. Okay.

22 Q. Okay.

23 A. Thank you.

24 Q. Mr. Chintam, did you discuss this deposition  
25 with anyone?



09:21:14 1 A. No. Just with my attorneys.

2 Q. Okay.

3 A. Yeah.

4 Q. And don't tell me anything you've discussed  
5 with your attorneys, but did you discuss this  
6 deposition with anyone else?

7 A. No.

8 Q. Okay. What did you do to prepare for today's  
9 deposition?

10 A. Nothing. I mean, it's all obvious, so  
11 nothing.

12 Q. And what do you mean by "it's all obvious"?

13 A. So, yeah, I mean, we -- well, this is all  
14 settled, the case, actually in the mediated settlement  
09:21:43 15 agreement. We settled everything, and she got a  
16 portion. She's coming back to me again. I don't know  
17 for what. So in the end, she's going to lose.

18 Q. Okay. And "she" is -- are you referring to  
19 Deepa?

20 A. Yes.

21 Q. Okay. Did you review any documents to  
22 prepare for today?

23 A. No.

24 Q. Okay. Do you understand what's at issue in  
25 this case?

09:22:12 1 A. Yes.

2 Q. Okay. What -- what do you understand to be  
3 at issue?

4 A. She is coming back again for something which  
5 she already got and already settlement in mediated  
6 settlement agreement.

7 Q. Okay.

8 A. So everything was disclosed. Everything was  
9 given. She took all the money, and she's just coming  
10 back again.

11 Q. Okay. What specific items is it that you're  
12 referencing?

13 A. All the -- all the -- all the property in the  
14 original petition. All the property in the original  
09:22:42 15 petition, she -- you filed.

16 Q. Okay.

17 A. Yes.

18 Q. Can you -- can you tell me what properties it  
19 is you're --

20 A. All --

21 Q. -- referencing?

22 A. -- the properties.

23 THE REPORTER: Wait for him to finish his  
24 before you --

25 THE WITNESS: Yeah.

09:22:52 1 Q. (By Mr. Freeman) And what do you mean by "all  
2 of the properties"?

3 A. Can you please give me the original petition?

4 Q. I -- I don't have a copy of it right here.

5 THE WITNESS: Yeah, can you get the  
6 original petition, so --

7 Q. (By Mr. Freeman) Well, just do your best to  
8 answer as you can.

9 A. It's like the India properties.

10 Q. And what are the India properties?

11 THE WITNESS: Jennifer, can I -- yeah.

12 MS. SATAGAJ: Objection, form.

13 Q. (By Mr. Freeman) But you can answer it.

14 A. No.

09:23:24 15 MS. SATAGAJ: I'm instructing the witness  
16 not to answer. Like, it's been asked and answered at  
17 this point.

18 MR. FREEMAN: You're instructing the  
19 witness not to answer the question about what the --  
20 to describe the India properties?

21 MS. SATAGAJ: Yes. He's already answered  
22 the question.

23 MR. FREEMAN: Okay. Let's go ahead and  
24 have a call with the Court. You're instructing him  
25 not to answer?

09:23:47 1 MS. SATAGAJ: Because you've asked the  
2 same question three times, and he's told you that it's  
3 in the original petition and that he doesn't recall  
4 offhand the descriptions of each of the items listed  
5 in the original petition.

6 MR. FREEMAN: He did not actually say  
7 that, no.

8 THE WITNESS: I said that.

9 MR. FREEMAN: He didn't say that.

10 MS. SATAGAJ: Okay. Can we take a break?

11 MR. FREEMAN: Sure.

12 MS. SATAGAJ: Okay.

13 MR. FREEMAN: We can go off the record.

14 THE VIDEOGRAPHER: We're off the record  
09:24:15 15 at 9:23 a.m.

16 (Break from 9:23 a.m. to 9:31 a.m.)

17 THE VIDEOGRAPHER: We're back on the  
18 record at 9:31 a.m.

19 Q. (By Mr. Freeman) Mr. Chintam, what do you  
20 understand to be at issue in this case?

21 A. There is no issue according to me.

22 Q. Okay. Do you understand this case to involve  
23 allegations related to several properties?

24 A. Yes. The properties were already -- already,  
25 you know, settled in the mediation settlement

09:33:22 1 agreement.

2 Q. Okay.

3 A. So --

4 Q. And what properties are those?

5 A. Agricultural land situated in Krishna- --

6 Survey No. 33 Krishnayapalem. The second I see Pangra

7 property. The third I see 2-3/56 Ground, First and

8 second floors Miyapur. The other property being 183,

9 184 Bongloor.

10 Q. Okay.

11 A. And the other one I see, block numbers

12 Mubarak Nagar.

13 Q. Okay.

14 A. And I see there is a bank account number

09:34:03 15 03- -- ending 0397, and also there is a bank account

16 number ending in 7- -- 7901.

17 Q. Okay. Thank you.

18 So if during this deposition I refer to

19 Krishnayapalem, will you understand what I'm referring

20 to?

21 A. Yes.

22 Q. And if I refer to the Pangra property, will

23 you understand what I'm referring to?

24 A. Yes.

25 Q. Okay. If I refer to the Bongloor property,

09:34:31 1 will you understand what I'm referring to?

2 A. Yes. I see it here.

3 Q. And if I refer to the Miyapur property, will  
4 you understand what I'm referring to?

5 A. Yes.

6 Q. And if I refer to the Mubarak Nagar property,  
7 will you understand what I'm referring to?

8 A. Yes.

9 Q. Okay. With respect to the bank accounts,  
10 were those both at a bank known as ICIC Bank?

11 A. Yes. ICIC Bank.

12 Q. Okay. Mr. Chintam, can you tell me each  
13 email address that you currently have?

14 A. Bonibobj@gmail.com, b-o-n-i-b-o-b-j.

09:35:11 15 Q. Okay. And what other email addresses?

16 A. Boni@vectrainfosysinc.com.

17 Q. Okay. And what else?

18 A. Boni@quad -- boni.chantam@quadidinc.com.

19 Q. Okay.

20 A. That's pretty much there is.

21 Q. @quad?

22 A. Uh-huh.

23 Q. And do you have any others?

24 A. Yes. Boni.chintam2@allergan.com.

25 Q. Could you repeat that last part?

09:35:44 1 A. Allergan, A-l-l-e-r-g-a-n.  
2 Q. Okay. And what other email accounts do you  
3 have?  
4 A. That's -- that's all I use.  
5 Q. Okay. Do you have one that ends  
6 @celanesc.com?  
7 A. Oh, I left that company a long time back,  
8 Celanesc.  
9 Q. Okay.  
10 A. Yeah.  
11 Q. No -- no email account --  
12 A. No.  
13 Q. -- there?  
14 Okay. Have you had any other email  
09:36:14 15 accounts over the past five years?  
16 A. No. These are the primary ones I use.  
17 Q. Okay. All right. When you say "primary  
18 ones," are there others that you don't use as often?  
19 A. No. This is it.  
20 Q. There are no others that you use?  
21 A. Huh-uh.  
22 Q. How many lawsuits have you been involved in?  
23 A. Two lawsuits.  
24 Q. Two lawsuits?  
25 A. Yes.

09:36:39 1 Q. And which lawsuits? Are those two that  
2 you --

3 A. Yes.

4 Q. -- mentioned earlier?

5 A. Yes.

6 Q. And no other lawsuits?

7 A. No.

8 Q. Okay. Have you been involved in any other  
9 court proceedings?

10 A. No.

11 Q. Okay. Now, there was your divorce as well,  
12 correct?

13 A. Yes.

14 Q. Okay.

09:37:01 15 A. So you -- you consider that, yes, that's one  
16 more. That's 2017. That was the first one, yeah.

17 Q. Okay. Any other court proceedings that  
18 you've been involved in?

19 A. No.

20 Q. I mean, U.S., Canada, Mexico, India,  
21 anywhere? No other court proceedings?

22 A. India I had lawsuits --

23 Q. Okay.

24 A. -- for the properties -- a couple of  
25 properties.



09:37:24 1 Q. Okay. You had lawsuits in India?

2 A. Yes.

3 Q. Okay. What was the nature of -- of those  
4 lawsuits?

5 A. And I sold -- I sold those properties, but I  
6 did not have -- I did not -- I took -- I took the  
7 money, but I didn't on time made the registration to  
8 them. So -- so the sale fully not executed, so I had  
9 to settle that, so --

10 Q. Oh, okay. How many other lawsuits were  
11 there?

12 A. I think two lawsuits.

13 Q. Two lawsuits?

14 A. Yes.

09:37:56 15 Q. Okay. In India?

16 A. Yes.

17 Q. Okay. Are there any other lawsuits in any  
18 other country or anywhere else?

19 A. No.

20 Q. So you're -- you're telling me there were  
21 three here.

22 A. Uh-huh.

23 Q. Your divorce?

24 A. Uh-huh.

25 Q. The child support case, a case involving

09:38:13 1 Vectra Infosys, correct?

2 A. Yes.

3 Q. And two lawsuits in India?

4 A. Yes.

5 Q. Okay.

6 A. Yeah, I mean, they are settled. India, it's  
7 all closed, settled, so --

8 Q. Okay.

9 A. It's not open. This is -- only the -- only  
10 the active one is this one.

11 Q. Okay.

12 A. Yeah.

13 Q. With -- with respect to Vectra Infosys, did  
14 the Court hold against Vectra Infosys in this case?

09:38:36 15 MS. SATAGAJ: Objection, form.

16 Instructing the witness not to answer.

17 MR. FREEMAN: It's going to be a long day  
18 if you're going to keep instructing not to answer.  
19 That's not proper. It's improper under the Rules.

20 MS. SATAGAJ: It is proper. The  
21 questions that are proper questions in which the  
22 answer leads -- it's reasonably calculated to lead to  
23 admissible evidence in trial. So a question about a  
24 company that's not at issue in the current lawsuit  
25 isn't reasonably calculated to lead to admissible

09:39:11 1 evidence.

2 MR. FREEMAN: It is at issue in this  
3 lawsuit.

4 MS. SATAGAJ: It's not.

5 MR. FREEMAN: Okay. I'm going to compile  
6 these, I guess, if you're going to keep objecting and  
7 instructing the witness not to answer. You can't even  
8 instruct the witness not to answer based on relevancy.  
9 I need you to cite me to the authority that gives you  
10 the ability to instruct the witness here not to  
11 answer, or I need you to withdraw that instruction.

12 MS. SATAGAJ: I'm not going to withdraw  
13 that instruction.

14 MR. FREEMAN: Okay. I would like to --  
09:39:51 15 I'd like to have a conference call with the Court.

16 MS. SATAGAJ: Okay.

17 MR. FREEMAN: Okay.

18 THE VIDEOGRAPHER: Counsel, do you want  
19 to go off the record?

20 MR. FREEMAN: Can we please go off the  
21 record?

22 THE VIDEOGRAPHER: We're off the record  
23 at 9:38 a.m.

24 (Break from 9:38 a.m. to 9:50 a.m.)

25 THE VIDEOGRAPHER: We're back on the

09:51:57 1 record at 9:50 a.m.

2 Q. (By Mr. Freeman) Mr. Chintam, you mentioned  
3 that you had been involved in two lawsuits in India;  
4 is that correct?

5 A. Yes.

6 Q. Okay. Were there any other lawsuits?

7 A. No.

8 Q. And you're certain?

9 A. Yes, I am certain.

10 Q. Okay. And do you feel like your recollection  
11 of that is good?

12 A. I mean, to the be- -- to the best of my  
13 knowledge.

14 Q. Okay. Tell me about the lawsuits in India.

09:52:24 15 A. I think I just explained you a few minutes  
16 back.

17 Q. Okay. I'm a little bit slow. Can you tell  
18 me what those two lawsuits were?

19 A. Yeah. They were -- basically, they were  
20 under contract, and I couldn't execute in time, so  
21 the -- the -- you know, the -- the bias for the  
22 lawsuit against me.

23 Q. Okay.

24 A. Yeah.

25 Q. What properties did those lawsuits involve?

09:52:52 1 A. One was Bongloor, and one was Krishnayapalem.

2 Q. Okay. All right. Who were the parties in  
3 those suits?

4 A. For Bongloor, it was Boddu Sayanna, and for  
5 Krishnayapalem, it was Mydam Rajanna.

6 Q. Okay. Can you spell the name of the first  
7 one?

8 A. Yeah. S-a-y-a-n-n-a --

9 Q. Okay.

10 A. -- B-o-d-b-u.

11 Q. Okay. And the second one?

12 A. R-a-j-a-n-n-a, Mydam, M-y-d-a-m.

13 Q. Okay. So there was a lawsuit brought against  
14 you by Apollo Rajanna?

09:53:39 15 A. No, that's not Apollo.

16 Q. No?

17 Was the other suit brought against you  
18 by --

19 A. Mydam Rajanna?

20 Q. Bo- -- Boddu Sayanna?

21 A. Yeah. One lawsuit Bongloor, Boddu Sayanna,  
22 and one lawsuit Mydam Rajanna.

23 Q. Mydam --

24 A. Uh-huh.

25 Q. -- Rajanna?

09:54:00 1 A. Uh-huh.

2 Q. Okay. Okay. And which -- which person was  
3 related to which property?

4 A. Bongloor, Boddu Sayanna.

5 Q. Okay.

6 A. Krishnayapalem, Mydam Rajanna.

7 Q. Okay. Did you know either of those  
8 individuals prior to the lawsuit?

9 A. Yes, I know them.

10 Q. Okay. How did you know Boddu Sayanna?

11 A. Well, he's in my -- he's in my neighboring  
12 village.

13 (Reporter clarification.)

14 A. Neighboring village, where I grow up.

09:54:38 15 Q. (By Mr. Freeman) Okay.

16 A. Yeah.

17 Q. How long had you known him?

18 A. I don't recollect, but maybe like -- before  
19 that, like few years.

20 Q. Like two years or like ten?

21 A. I don't know. In between.

22 Q. Okay. What about Mydam Rajanna?

23 A. He's in my same village.

24 Q. Okay.

25 A. So I know him quite longer.

09:55:04 1 Q. Okay.  
2 A. Yeah.  
3 Q. Like all your lifelong or --  
4 A. Yeah.  
5 Q. Okay.  
6 A. As -- as much as I know, yeah.  
7 Q. Okay. Was he your same age?  
8 A. No.  
9 Q. Was he older or younger?  
10 A. Older.  
11 Q. Okay. How often did you talk to him?  
12 A. I don't talk to him (indiscernible).  
13 Q. You don't talk to him at all?  
14 A. (No response.)  
09:55:25 15 Q. Have you talked to him since the lawsuit?  
16 A. Maybe once or twice.  
17 Q. Okay.  
18 A. Yeah.  
19 Q. What about?  
20 A. Yeah, just to -- you know, to settle things.  
21 Q. Okay.  
22 A. So basically to get that over, so get that  
23 registration complete to his name.  
24 Q. Okay.  
25 A. Yeah.

09:55:46 1 Q. So you had discussions with Mydam Rajanna?

2 A. Yeah. To settle the case basically.

3 Q. To settle the case?

4 A. Yeah. And --

5 Q. When were those discussions?

6 A. 2018, I believe.

7 Q. In 2018?

8 A. Yeah.

9 Q. Okay. Do you know when in 2018?

10 A. I don't recollect.

11 Q. Okay. And what did you discuss on those?

12 A. Yeah. So basically to -- you know, to finish  
13 the -- the sell process, closure process.

14 Q. Okay.

09:56:14 15 A. Yeah.

16 Q. And what do you mean by that?

17 A. Like here, you -- you have a closing here,  
18 right? Same thing. Close a property.

19 Q. So to go through the closing --

20 A. Yes.

21 Q. -- process with him?

22 A. Yes.

23 Q. Okay. Why was that necessary?

24 A. I sold the property to him, so obviously --

25 Q. Okay.



09:56:32 1 A. Yeah, I mean, when you're buying or selling  
2 something, you need to finish the process, right?

3 Q. Okay.

4 A. That's what I did.

5 Q. Was that not resolved by the lawsuit?

6 A. No.

7 Q. What did the lawsuit --

8 A. The lawsuit awarded to them, but I had to go  
9 and do my part.

10 Q. And what do you mean by your part?

11 A. Sign -- sign the papers, close the process.

12 Like when you buy a property, you sell and buy and go  
13 finish it, right? So same thing I did.

14 Q. So was there a bunch of paperwork you had to  
09:57:03 15 go sign?

16 A. Yes.

17 Q. Okay. Where did you sign that?

18 A. In -- in -- over there in Krishnayapalem.

19 Q. Okay. And when was that signed?

20 A. Somewhere in 2018.

21 Q. Okay. Do you know more specifically?

22 A. I don't recollect.

23 Q. Was it early in 2018 or late?

24 A. I don't recollect. Sometime in 2018.

25 Q. Sometime in 2018, but you --

09:57:24 1 A. Yes.

2 Q. -- don't recall when?

3 A. One second. I think it -- I just glanced  
4 through this. We might have it. Do you see -- let me  
5 put my glasses. Because the -- the encumbrance  
6 certificate will have the date when it has happened.

7 Q. Okay.

8 A. So maybe that we can just follow and see  
9 the --

10 Q. Okay. Mr. Chintam, why don't we -- why don't  
11 we come back to that?

12 A. Yeah. I see it here. Oh, this one -- okay.  
13 You want to -- okay.

14 Q. Do -- do you know -- do you know the answer?

09:57:54 15 A. No, I have to look at here. And we have the  
16 encumbrance certificate. I -- I gave --

17 (Reporter clarification.)

18 A. They call it an E.C. Certificate. E.C.  
19 Encumbrance Certificate.

20 MR. FREEMAN: I believe encumbrance.

21 Encumbrance, yeah.

22 Q. (By Mr. Freeman) I do not.

23 MS. SATAGAJ: And we -- can we clarify  
24 for the record, what document are you looking at?

25 THE WITNESS: I'm looking for the

09:58:26 1 Krishnayapalem Encumbrance Certificate. I think I --  
2 I gave you.

3 MS. SATAGAJ: What document are you  
4 looking at in that notebook?

5 THE WITNESS: He gave me this file,  
6 right? So I'm looking at the -- the document of the  
7 Encumbrance Certificate for Krishnayapalem.

8 Q. (By Mr. Freeman) Okay.

9 THE WITNESS: Can we get that?

10 Q. (By Mr. Freeman) Mr. Chintam --

11 A. Yeah.

12 Q. -- we'll come back to that. I'll ask you  
13 some --

14 A. Yeah. Because I --

09:58:47 15 Q. -- specific questions.

16 A. -- don't know the exact date. If you want a  
17 specific date, I can give the date by looking at the  
18 document.

19 Q. Understood.

20 A. Yeah.

21 Q. If you will, for now, just give me your best  
22 answer based --

23 A. Okay.

24 Q. -- on your recollection.

25 A. Yeah. I mean, I try to give, but you're

09:58:57 1 asking me specific dates, so that's why -- if I have  
2 to give you a specific date, I have -- I have to look  
3 at that.

4 Q. Understood. I -- and I appreciate that.

5 A. Thank you.

6 Q. Did -- so what kind of paperwork  
7 specifically? What -- what all did you sign?

8 A. It's a sell deed.

9 Q. A sale deed?

10 A. Yes.

11 Q. Was there anything else?

12 A. That's it.

13 Q. Okay. Just a sale deed?

14 A. Uh-huh.

09:59:20 15 Q. Did you have to execute any tax  
16 documentation?

17 A. I don't recollect. I don't know.

18 Q. Okay. Were there any other contracts?

19 A. No. I mean, the sale deed was -- well, the  
20 sale deed is final in India.

21 Q. Okay. Was any -- were any funds exchanged?

22 A. Yeah. Obviously, he paid the funds.

23 Q. Okay. How much did he pay?

24 A. I don't recollect, but we might have a sheet.

25 THE WITNESS: Jennifer, can I have the

09:59:46 1 sheet of the properties which had the -- my sale  
2 price.

3 A. Which -- which was in provided in mediation  
4 settlement agreement. I don't recollect.

5 Q. (By Mr. Freeman) Okay.

6 A. Yeah, because this was all part of the  
7 mediation settlement agreement.

8 THE REPORTER: I'm not understanding what  
9 he's saying when he's speaking really fast.

10 MR. FREEMAN: You know, ask him to slow  
11 down.

12 Q. (By Mr. Freeman) If you will, just try to --

13 A. Yeah.

14 Q. -- slow down just --

10:00:08 15 A. Okay.

16 Q. -- A little bit.

17 A. So -- so --

18 MS. SATAGAJ: Mr. Freeman, would you  
19 clarify for the witness which property you're asking  
20 him what it's for?

21 MR. FREEMAN: I'm -- I'm about to ask  
22 which one --

23 MS. SATAGAJ: Oh.

24 MR. FREEMAN: -- we're talking about.

25 MS. SATAGAJ: Thank you.

10:00:20 1 Q. (By Mr. Freeman) Let me ask you, can you  
2 clarify which property you're reference -- referring  
3 to?

4 A. You're referring to Krishnayapalem, so I am  
5 referring to Krishnayapalem.

6 Q. Okay.

7 A. Yes.

8 Q. And -- and who were you referring to as  
9 paying to you?

10 A. He paid. My- --

11 Q. And who -- who is "he"?

12 A. Mydam Rajanna.

13 Q. Okay.

14 A. Yeah.

10:00:40 15 Q. Okay.

16 MR. FREEMAN: You're good? Kind of?

17 THE REPORTER: Kind of.

18 MR. FREEMAN: Okay.

19 Q. (By Mr. Freeman) Mr. Chintam, so there  
20 were -- there was a sale deed, and that was it for the  
21 closing?

22 A. Yeah. I mean, in the -- generally, the --  
23 that we will do the record of the Encumbrance  
24 Certificate.

25 Q. Okay. And what is an Encumbrance

10:01:04 1 Certificate?

2 A. That gives the current owner of the property.  
3 Like, for example, if you search an owner here, right,  
4 you get who is the current owner. So who's the  
5 current owner and what is the market value.

6 Q. Okay.

7 A. Yeah.

8 Q. And who do you -- who did you provide the  
9 Encumbrance Certificate to?

10 A. I gave it to my attorney.

11 Q. In India?

12 A. No.

13 Q. No one --

14 A. In India, you don't need to give it to  
10:01:31 15 anybody. So here, I gave it -- I gave the Encumbrance  
16 Certificate to Jennifer.

17 Q. Okay.

18 A. Yeah.

19 Q. When did you give the Encumbrance  
20 Certificate?

21 A. I mean, I don't know. Last few -- I don't  
22 know. Last few months or something.

23 Q. Okay.

24 A. I don't recollect.

25 Q. Okay. So you're talking about currently --

10:01:45 1 A. Yes.

2 Q. -- and not --

3 Okay. But back in 2018, is that when  
4 you -- when you executed an Encumbrance Certificate?

5 A. Yes.

6 Q. Okay. And who --

7 A. It's a --

8 Q. Who did you provide the Encumbrance  
9 Certificate to?

10 A. To -- see -- see, in India -- let me explain.  
11 Maybe it's better.

12 In India, when you execute a sale deed,  
13 that Encumbrance Certificate is automatically  
14 generated.

10:02:15 15 THE REPORTER: Wait.

16 A. In India --

17 THE REPORTER: After --

18 THE WITNESS: Yeah.

19 THE REPORTER: -- the Encumbrance  
20 Certificate is...

21 A. Encumbrance Certificate is a by-product.

22 THE REPORTER: By-product?

23 THE WITNESS: Yes.

24 A. So that means like when you execute a sale  
25 deed, the government will generally that -- who is,



10:02:25 1 you know, the current owner.

2 Like, for example, if you want to go buy  
3 something, you check that document to -- you know, if  
4 you're really buying from the guy.

5 Q. (By Mr. Freeman) Okay.

6 A. So that's part of that.

7 Q. Okay.

8 MS. SATAGAJ: And, Mr. Chintam, if --  
9 again, if you'll slow down just a little bit.

10 THE WITNESS: Okay.

11 MS. SATAGAJ: It's -- it'll make it  
12 easier for the court reporter to take down your  
13 testimony.

14 THE WITNESS: Okay. I will try. I mean,  
10:02:48 15 that's how my accent, and, you know -- so I don't  
16 think I can help so much, but, yeah.

17 MS. SATAGAJ: I think she can understand  
18 you.

19 THE WITNESS: Okay.

20 MS. SATAGAJ: It's just when you speak  
21 faster --

22 THE WITNESS: Okay.

23 MS. SATAGAJ: -- it makes it hard.

24 THE WITNESS: Okay.

25 MS. SATAGAJ: That's all.

10:03:03 1 Q. (By Mr. Freeman) Who drafted the deed?

2 A. I don't recollect.

3 Q. Did you have someone draft the deed?

4 A. No. I went -- that's the buyer's  
5 responsibility.

6 Q. So Mydam Rajanna --

7 A. Yeah.

8 Q. -- had someone --

9 A. Yeah.

10 Q. -- draft the deed?

11 A. Yeah.

12 Q. Okay. How was that deed provided to you?

13 A. No. It was -- it was -- you know, when we  
14 went there, we signed it.

10:03:29 15 Q. Okay.

16 A. So --

17 Q. Who -- who presented the deed to you?

18 A. Mydam Rajanna and the -- the -- whoever the  
19 people at the -- at the closing office.

20 Q. Okay.

21 A. So --

22 Q. Where was the closing office?

23 A. In Krishnayapalem.

24 Q. Okay. And whose office was that?

25 A. It's a government office.

10:03:46 1 Q. Okay. What government office specifically?

2 A. It's (indiscernible) government registration  
3 office.

4 Q. Okay. And what's the name of that office?

5 A. I don't recollect. It's just a government  
6 registration office.

7 Q. Where is that office located specifically?

8 A. Krishnayapalem.

9 Q. Okay. And what's the basic location within  
10 Krishnayapalem?

11 A. Vijayada.

12 Q. Sorry?

13 A. That's a big city.

14 THE REPORTER: Spell it.

10:04:13 15 THE WITNESS: Vijayada, V-i-j-a-y-a-d-a.

16 Q. (By Mr. Freeman) Okay. It was in -- is  
17 Krishnayapalem a state?

18 A. No. It's a town.

19 Q. Okay. And what is Vijayada?

20 A. Vijayada? It's like Dallas and Irving, for  
21 example. Vijayada is like Dallas.

22 Q. So they're part of one --

23 A. Yeah.

24 Q. -- metroplex?

25 A. Exactly.

10:04:40 1 Q. Okay. The -- are you telling me the closing  
2 office that you went to was in Vijayada?

3 A. Krishnayapalem.

4 Q. Okay. And how is Vijayada relevant?

5 A. It's just a metroplex. You're asking a big  
6 geography, right --

7 Q. Okay.

8 A. -- so --

9 Q. Okay.

10 A. Yeah.

11 Q. So the closing office was in Krishnayapalem?

12 A. Yes.

13 Q. Okay. Where within Krishnayapalem?

14 A. It's a village, so I don't know. I can't

10:05:07 15 recollect exact address.

16 Q. Okay. How did you get to this office?

17 A. By -- by car.

18 Q. Okay. Whose car?

19 A. It's a rental car.

20 Q. Okay. So you rented a car and --

21 A. Yes.

22 Q. -- drove there?

23 A. Yes.

24 Q. Okay. So would there be records of your  
25 rental car?

10:05:28 1 A. I don't recollect anything.

2 MS. SATAGAJ: Object.

3 A. Come on, man. What is this?

4 MS. SATAGAJ: Objection, form.

5 Q. (By Mr. Freeman) Well -- okay. Have you  
6 produced records of your rental car?

7 MS. SATAGAJ: Objection, form.

8 THE WITNESS: What is this? What is  
9 this?

10 MS. SATAGAJ: It's not reasonably  
11 calculated to lead to admissible evidence in this  
12 case. I'm instructing the witness not to answer.

13 MR. FREEMAN: Okay. You're instructing  
14 the witness not to answer about whether there are  
10:05:52 15 records related to the rental car that he says he  
16 drove to the office where he executed the closing on  
17 these properties at issue?

18 MS. SATAGAJ: Correct.

19 Q. (By Mr. Freeman) Okay. When did you travel  
20 to India in 2018?

21 A. I don't recollect.

22 Q. Please give me your best -- best  
23 recollection.

24 A. I don't know, man. After COVID, it's crazy,  
25 so --

10:06:22 1 Q. Okay. But 2018 --  
2 A. Yeah.  
3 Q. -- I'm asking about.  
4 A. Yeah, 2018, I don't remember.  
5 Q. Did you travel to India in 2018?  
6 A. Yeah, obviously I have.  
7 Q. How many times?  
8 A. I don't recollect totally (indiscernible)  
9 when I went.  
10 Q. Excuse me?  
11 A. I don't recollect.  
12 Q. Okay. Was it like one, or was it like five  
13 times?  
14 A. It's the same answer. I don't recollect.  
10:06:42 15 Q. Okay. But you drove a rental car to --  
16 A. I did not drive. I did not drove in India.  
17 Somebody else drove.  
18 Q. Who drove?  
19 A. The rental car people.  
20 Q. Okay. The rental car people drove you?  
21 A. Yes.  
22 Q. Okay. What rental car company did you use?  
23 A. I --  
24 MS. SATAGAJ: Objection, form.  
25 Instructing the witness not to answer.

10:07:07 1 Q. (By Mr. Freeman) Okay. You don't know what  
2 rental car company you used?

3 MS. SATAGAJ: Objection, form.  
4 Instructing the witness not to answer.

5 Q. (By Mr. Freeman) Okay. How did you pay for  
6 the rental car?

7 MS. SATAGAJ: Objection, form. I'm  
8 instructing the witness not to answer.

9 Q. (By Mr. Freeman) Okay. So on this date, you  
10 executed closing agreements on the property in  
11 Krishnayapalem. Do you remember where specifically  
12 that government office was?

13 A. No.

14 Q. Had you ever been to that government office  
10:07:50 15 before?

16 A. No.

17 Q. How did you know how to get there?

18 A. The -- you can Google it.

19 Q. Okay. Is that how you --

20 A. Yeah.

21 Q. -- looked it up?

22 A. Yeah.

23 Q. Okay. And did you Map Quest it on your  
24 phone?

25 MS. SATAGAJ: Objection, form. I'm

10:08:10 1 instructing the witness not to answer.

2 MR. FREEMAN: Okay. I'm going to go off  
3 the record now because we're going to need -- we're  
4 going to need to -- we can stay on the record for now,  
5 but we can't keep instructing the witness not to  
6 answer relevant questions. These are -- there's no  
7 doubt about them. They're relevant. These are now in  
8 bad faith.

9 I'm going to email the Court again, let  
10 them know the urgency of this; otherwise, if this is  
11 how it's going to continue to go, I think we're going  
12 to have to shut down the deposition and retake this  
13 after we meet with the Court.

14 MS. SATAGAJ: Okay. I mean, it's  
10:08:44 15 absolutely not (overtalk).

16 THE WITNESS: Yeah, that's fine. Are we  
17 done?

18 MR. FREEMAN: Let's -- let's stay on the  
19 record. I would like for you to explain to me how  
20 the -- the entire basis for the instruction not to  
21 answer these questions.

22 MS. SATAGAJ: Okay. Under Texas Rules of  
23 Civil Procedure 199(f): It's permissible for you to  
24 instruct a witness not to answer. So if it's  
25 necessary to reserve a privilege, comply with a court



10:09:17 1 order, or the Rules. The "rules" being the Texas  
2 Rules of Civil Procedure.

3 MR. FREEMAN: Uh-huh.

4 MS. SATAGAJ: So in a Chapter 9 lawsuit  
5 in the Texas Family Code dealing with property not  
6 disclosed on divorce, meaning property that's still  
7 owned by the parties on the date of divorce and  
8 subject to division, the recent questions that you  
9 were asking about the rental car company are not  
10 reasonably calculated to lead to admissible evidence.

11 So under the Rules, it's not relevant;  
12 and, therefore, the witness does not need to answer  
13 the question.

14 MR. FREEMAN: Okay. And that's your  
10:09:52 15 entire basis?

16 MS. SATAGAJ: That's my basis.

17 MR. FREEMAN: Okay. Is there anything  
18 else that's your basis?

19 MS. SATAGAJ: As we sit here right now,  
20 that's the basis.

21 MR. FREEMAN: Okay. We can go off the  
22 record.

23 THE VIDEOGRAPHER: We're off the record  
24 at 10:08 a.m.

25 (Break from 10:08 a.m. to 10:36 a.m.)

10:38:04 1 THE VIDEOGRAPHER: We're back on the  
2 record at 10:36 a.m.

3 Q. (By Mr. Freeman) Mr. Chintam, we were  
4 discussing a sale -- the execution of closing  
5 documents related to the -- the Krishnayapalem  
6 property. Do I understand your testimony to be that  
7 you executed closing documents on that transaction in  
8 2018?

9 A. Yeah. Closing was 9/2018, but it was under  
10 contract in late 2016.

11 Q. Okay. Do you have a copy of that contract?

12 A. I do not have it with me.

13 Q. Okay. Have you produced a copy of that  
14 contract in this lawsuit?

10:38:43 15 A. I think so, yes.

16 Q. Okay.

17 A. And -- yeah, we gave that on mediation to  
18 Deepa in 2017 July 18.

19 Q. And in this lawsuit, have you produced a copy  
20 of that contract?

21 A. Yes. I -- I gave it to my attorney.

22 Q. Okay. Has that been produced to me?

23 A. I don't know.

24 MR. FREEMAN: Has that been produced to  
25 me?

10:39:06 1 MS. SATAGAJ: Yes.

2 MR. FREEMAN: Okay.

3 Q. (By Mr. Freeman) Who is that contract with?

4 A. Mydam Rajanna.

5 Q. Okay. And when was it executed?

6 A. 20- -- late 2016.

7 Q. Was anyone a witness to that contract?

8 A. I am sure. I mean, it should be on that one,

9 but I don't recollect.

10 Q. Did anyone see you enter into that contract?

11 A. Yeah. I -- I mean, I don't recollect it.

12 Q. Where were you when you entered into that

13 contract?

14 A. I was in -- I think I was in India.

10:39:37 15 Q. Okay.

16 MS. SATAGAJ: And, Mr. Freeman, just to

17 clarify, we're still talking about the same property

18 before we went off the record, the Krishnayapalem?

19 MR. FREEMAN: Krishnayapalem.

20 MS. SATAGAJ: Okay. Thank you.

21 Q. (By Mr. Freeman) So you -- you maintain you

22 executed a contract to sell the property?

23 A. Yes.

24 Q. The Krishnayapalem property?

25 A. Yes.

10:39:55 1 Q. In 2016?  
2 A. Yes.  
3 Q. Okay. And that was with who?  
4 A. With Mydam Rajanna.  
5 Q. With Mydam Rajanna?  
6 Where were you when you executed that  
7 contract?  
8 A. I -- I -- I think I'm in India, but I don't  
9 recollect a hundred percent.  
10 Q. Were you present with Mydam Rajanna?  
11 A. I don't recollect. It's four or five years  
12 back.  
13 Q. Okay.  
14 A. Yeah.  
10:40:21 15 Q. Did you possibly do it by email?  
16 A. I don't recollect.  
17 Q. Did you have a copy of that contract in your  
18 email?  
19 A. I don't recollect.  
20 Q. Okay. Did you draft --  
21 A. I gave -- I -- I -- no, I did not. I gave it  
22 to attorney.  
23 Q. Did you have someone draft the contract?  
24 A. I don't remember.  
25 Q. Okay.

10:40:40 1 A. Yeah.

2 Q. When did you first receive that contract?

3 A. I don't recollect.

4 Q. And you don't know if you ever had an

5 electronic version of the contract?

6 A. I don't know.

7 Q. Okay. And you didn't have anyone that you

8 would generally have review those contracts?

9 A. No.

10 Q. Okay. And what was the sales price for the

11 property in that contract?

12 A. I -- I -- I don't remember off the top of my

13 head.

14 Q. Okay.

10:41:05 15 A. We produced those documents and mediated on

16 the mediation --

17 Q. Okay.

18 A. -- with Deepa, so --

19 Q. Okay.

20 A. She -- yeah, we gave all that information so.

21 Q. I appreciate it, but we're -- we're here

22 today in a different lawsuit.

23 A. Okay.

24 Q. Okay.

25 A. Okay.

10:41:18 1 Q. What -- what -- what do you -- what's your  
2 best estimate of what the sales price of that contract  
3 was?  
4 A. I don't -- I don't remember. I -- I gave all  
5 that documentation.  
6 Q. Okay. And you don't have no idea?  
7 A. Yeah, I don't remember.  
8 Q. Did you ever receive the sales price?  
9 A. Yeah, of course.  
10 Q. When did you receive it?  
11 A. 2016, '17 time frame.  
12 Q. You received it prior to closing the con- --  
13 A. Yes.  
14 Q. -- prior to closing?  
10:41:44 15 A. Yes.  
16 Q. Okay. Where did you deposit that?  
17 A. It was a cash transaction.  
18 Q. Okay. So you received pure cash --  
19 A. Yes.  
20 Q. -- for the contract price?  
21 A. Yes.  
22 Q. And where -- what did you do with that cash?  
23 A. Oh, I invested in a different business.  
24 Q. Okay. What business?  
25 A. It's a fish and chicken business.

10:42:05 1 Q. Fish and chicken business?  
2 A. Yes.  
3 Q. Okay. And what's the name of that?  
4 A. We just call it a fish and chicken business.  
5 Q. Okay.  
6 A. Yeah.  
7 Q. And what does that fish and chicken business  
8 do?  
9 A. It's just a -- you know, they grow -- they  
10 grow chicken.  
11 Q. Okay. Where is that business located?  
12 A. It's in India.  
13 Q. Okay. Where in India?  
14 A. It's in Medak.  
10:42:27 15 Q. Can you spell that?  
16 A. M-e-d-a-k.  
17 Q. Chinmedak?  
18 A. No. M-e-d-a-k.  
19 Q. Medak?  
20 A. Uh-huh.  
21 Q. Okay. Do you own all of the fish and chicken  
22 business?  
23 A. It was a partnership.  
24 Q. Who is -- who is it a partnership with?  
25 A. Krishna Reddy.

10:42:46 1 Q. Krishna Reddy?  
2 A. Uh-huh.  
3 Q. Okay. Who is Krishna Reddy?  
4 A. It is a business partner.  
5 Q. Okay. Did you start this fish and chicken  
6 business?  
7 A. Yes. I mean, I was part of the business.  
8 It -- it was indiscernible.  
9 Q. Okay. Is it -- is it under an entity?  
10 A. Yes.  
11 Q. Okay. What's the name of that entity?  
12 A. It's -- it's under his name, Krishna Reddy.  
13 Q. It's under his name?  
14 A. Uh-huh.  
10:43:13 15 Q. But you're also a partner?  
16 A. Yes.  
17 Q. Okay. Is your name on it?  
18 A. It was only on the partnership deed.  
19 Q. Okay. What do you mean by the partnership  
20 deed?  
21 A. It's like an agreement.  
22 Q. Okay. When did you enter into this  
23 partnership deed?  
24 A. 2016.  
25 Q. Okay. And what did the partnership deed



10:43:33 1 require?

2 A. I had to pay him so that we can do business.

3 Q. How much did you have to pay him?

4 A. I think I paid him 150 grand.

5 Q. 150,000?

6 A. Yeah.

7 Q. And that -- that came from the proceeds from  
8 the sale of the Krishnayapalem?

9 A. I mean, all -- all of the other properties.  
10 Not just that one but --

11 Q. Okay.

12 A. -- from multiple properties.

13 Q. Krishna Reddy -- how long did you know  
14 Krishna Reddy?

10:44:01 15 A. Maybe like ten years.

16 Q. Okay. Had you ever entered into any other  
17 transactions with Krishna Reddy?

18 A. No.

19 Q. You had never purchased any property from  
20 Krishna Reddy?

21 A. No.

22 Q. Any -- ever purchase any property from a  
23 relative of Krishna Reddy?

24 A. No.

25 MS. SATAGAJ: Objection, form.

10:44:18 1 Q. (By Mr. Freeman) Okay. So you believe you --  
2 you gave Krishna Reddy \$150,000?

3 A. Yes.

4 Q. In 2016?

5 A. Yes. 2016, 2017 time frame.

6 Q. And that was to claim a -- a partnership  
7 interest in a fish and chicken business?

8 A. Yes.

9 Q. And you don't know the legal name of that  
10 business?

11 A. It's Krishna Reddy.

12 Q. Okay. Where is that business located in  
13 Madal?

14 MS. SATAGAJ: Objection, form.

10:44:47 15 Q. (By Mr. Freeman) Maday [sic]? Where is that  
16 business located?

17 MS. SATAGAJ: Mr. Chintam, per the  
18 Judge's ruling, you're to still answer the question  
19 even if I object.

20 THE WITNESS: What is it?

21 MS. SATAGAJ: If you know the answer,  
22 you're to answer the question, even if I object --

23 THE WITNESS: Okay.

24 MS. SATAGAJ: -- per the Judge's  
25 ruling --

10:45:12 1 THE WITNESS: Okay.

2 MS. SATAGAJ: -- at the conference

3 that --

4 MS. SATAGAJ: Mr. Freeman and I had with

5 the Judge.

6 A. It's in Medak.

7 Q. (By Mr. Freeman) And where is it in Medak?

8 A. It's a small village.

9 Q. Okay. Where specifically within Medak?

10 A. I don't remember.

11 Q. Okay. You don't remember?

12 A. Uh-huh.

13 Q. Did you ever inspect the location of the

14 business?

10:45:28 15 A. No.

16 Q. Did you ever see any assets of the business?

17 A. No.

18 Q. Did you ever see any of the fish?

19 MS. SATAGAJ: Objection, form.

20 A. (No audible response.)

21 Q. (By Mr. Freeman) Can you please give us a

22 verbal answer?

23 A. No.

24 Q. Did you ever --

25 A. My -- my -- my dad takes care of it.

10:45:44 1 Q. Did you ever see any of the chicken?

2 A. I don't go. My dad goes. My daddy used to  
3 go, yeah.

4 Q. So you've never seen anything related to this  
5 business?

6 A. Yes.

7 Q. Okay. But nonetheless, you invested \$150,000  
8 in it?

9 A. Yeah. With my dad.

10 MS. SATAGAJ: Objection, form.

11 Q. (By Mr. Freeman) Have you ever received any  
12 revenue related to that investment?

13 MS. SATAGAJ: Objection, form.

14 Q. (By Mr. Freeman) Have you ever received any  
10:46:11 15 revenue?

16 A. It's not relevant.

17 Q. Have you ever -- have you ever received any  
18 revenue related to that investment?

19 A. It is not a relevant question.

20 Q. Have you ever received any revenue related to  
21 that investment?

22 A. It's not a relevant question.

23 Q. Have you ever received any revenue related to  
24 that investment?

25 A. It's not related.

10:46:34 1 MS. SATAGAJ: Mr. Chintam?  
2 THE WITNESS: Yes.  
3 MS. SATAGAJ: Per the Judge's ruling --  
4 THE WITNESS: Yeah.  
5 MS. SATAGAJ: -- even if it's not --  
6 whether a question is relevant will be determined at  
7 trial. So even if I object, if you know the answer to  
8 Mr. Freeman's question, you need to answer the  
9 question.  
10 Q. (By Mr. Freeman) Have you ever received any  
11 revenue related to that investment?  
12 A. Yes.  
13 Q. How much?  
14 A. I don't --  
10:46:57 15 MS. SATAGAJ: Objection, form.  
16 Q. (By Mr. Freeman) How much?  
17 A. (No audible response.)  
18 Q. How much, sir?  
19 A. I'm not answering.  
20 Q. Do you mind telling me why?  
21 A. This is not relevant. It's -- it's not part  
22 of the petition, so I'm not answering.  
23 Q. Where -- what did you do with the funds that  
24 you received?  
25 MS. SATAGAJ: Objection, form.

10:47:37 1 A. I'm not answering, so -- it does nothing to  
2 do with this case.

3 Q. (By Mr. Freeman) Do you mind telling me why?

4 A. No. It's not -- it's not part of the case,  
5 so --

6 Q. Do you have any other?

7 A. (Overtalk.)

8 The business is -- the -- the business --  
9 the business is already awarded to me, so I'm not  
10 answering anything related to that.

11 Q. Do you have any other reason for refusing to  
12 answer this question?

13 A. It's -- it's not part of the -- it -- see,  
14 whatever the -- whatever is awarded to me I can do  
10:48:04 15 whatever I want, so I don't have to answer to you.

16 Q. Okay.

17 A. Okay? Thank you.

18 Q. I appreciate that. Sure.

19 A. Thank you. Yeah.

20 Q. So did you ever receive revenue related to  
21 your investment in the fish and chicken business?

22 A. Please, is a joke? It's like twentyth --

23 MS. SATAGAJ: Objection, form.

24 A. It's like twentyth time you're asking the  
25 same thing. I told you the answer.

10:48:27 1 Q. (By Mr. Freeman) What is your answer?

2 A. I don't -- it's not relevant here. You know,  
3 it's not -- you know, it's not -- you want -- I  
4 decline to open the divorce case totally. Reopen the  
5 case or what?

6 MS. SATAGAJ: Objection, nonresponsive.

7 Q. (By Mr. Freeman) Did you ever receive any  
8 revenue related to your investment in the fish and  
9 chicken business?

10 MS. SATAGAJ: Objection, form.

11 MR. FREEMAN: Basis for objection?

12 Asked but not answered? I can appreciate  
13 you but --

14 MS. SATAGAJ: Yes, asked and not  
10:49:04 15 answered.

16 A. I can do anything whatever I want, okay, with  
17 my business, with my properties awarded in the divorce  
18 decree, so if you're open -- if -- if you're planning  
19 to open the -- everything, the whole divorce case,  
20 then that's a different sorry.

21 So it's not part of the original  
22 petition, and I'm not answering anything which is not  
23 part of your original petition. So I will answer  
24 anything to the five properties and your two bank  
25 accounts.

10:49:30 1 Q. (By Mr. Freeman) Okay. I appreciate --

2 A. Thank you.

3 Q. -- sir.

4 A. Thank you.

5 Q. So I understand you received -- you received  
6 funds from selling the property -- the Krishnayapalem  
7 property; is that correct?

8 A. Yes.

9 Q. Right. And you utilized those funds to  
10 invest in a fish and chicken business?

11 A. Yes.

12 Q. In Medon? Where was that business?

13 A. Medak.

14 Q. Medak.

10:49:57 15 You had -- you maintain that you had a  
16 partnership interest in that business, correct?

17 A. My friend, I am not going to answer anything  
18 which is not part of your five properties, so will I  
19 answer only to your five properties. So ask me for  
20 the five properties.

21 MS. SATAGAJ: Objection, nonresponsive.

22 Q. (By Mr. Freeman) Hmm, so --

23 A. So you can ask like a hundred times. I will  
24 give you the same answer, so --

25 Q. Was the Krishnayapalem property one of the



10:50:23 1 five properties?

2 A. Yes.

3 Q. Okay. And we're talking about the funds  
4 derived from the purported sale of the Krishnayapalem  
5 sale, correct?

6 A. Yes. That funds are already --

7 Q. And you -- and you invested those funds in a  
8 business in Medak?

9 A. Yes.

10 Q. And that was a fish and chicken business?

11 A. Yes.

12 Q. Did you ever receive a re- -- revenue related  
13 to that investment in the fish and chicken business?

14 A. Yes.

10:50:45 15 MS. SATAGAJ: Objection, form.

16 Q. (By Mr. Freeman) How much?

17 A. I'm not answering.

18 Q. When did you receive that revenue?

19 A. It's not relevant.

20 MS. SATAGAJ: Objection, form.

21 Q. (By Mr. Freeman) Who paid you that revenue?

22 A. It's not relevant.

23 Q. Who paid you that revenue?

24 A. Not relevant.

25 Q. Who paid you that revenue?

10:51:03 1 A. Not relevant.  
2 Q. Who paid you that revenue?  
3 A. Not relevant.  
4 Q. Who paid you that revenue?  
5 A. Not relevant.  
6 Q. When was that revenue paid to you?  
7 A. Not relevant.  
8 Q. When was that re- -- when was that revenue  
9 paid to you?  
10 A. Not relevant.  
11 MS. SATAGAJ: Mr. Freeman --  
12 Q. (By Mr. Freeman) Was anyone else -- did  
13 anyone else see that paid to you?  
14 A. Not relevant.  
10:51:17 15 Q. How was it paid to you?  
16 A. Not relevant.  
17 Q. Was it paid in cash?  
18 A. Not relevant.  
19 Q. Was it pay by check?  
20 A. Not relevant.  
21 MS. SATAGAJ: Mr. Freeman, can we take a  
22 break?  
23 MR. FREEMAN: Sure.  
24 THE VIDEOGRAPHER: We're off the record  
25 at 10:50 a.m.

10:52:46 1 (Break from 10:50 a.m. to 11:11 a.m.)

2 THE VIDEOGRAPHER: We are back on the  
3 record at 11:11 a.m.

4 Q. (By Mr. Freeman) Okay. Mr. Chintam, did you  
5 ever receive funds from your investment in the fish  
6 and chicken --

7 A. Yes.

8 Q. -- business?

9 A. Yes.

10 Q. When did you receive those?

11 A. My dad gets it, so --

12 Q. Who is your father?

13 A. My father? You mean to say my father name  
14 or --

11:13:14 15 Q. Yes, sir.

16 A. It's Raja Mallu.

17 Q. Can you spell that for us?

18 A. R-a-j-a M-a-l-l-u.

19 Q. Okay. Raja Mallu?

20 A. Yes.

21 Q. Okay. Where does your father, Raja Mallu,  
22 live?

23 A. He lives in my village.

24 Q. And where is your village?

25 A. Sikinjapoor.

11:13:36 1 Q. Okay. And where is that in relation to  
2 Medak?  
3 A. It's like 50 miles, I guess.  
4 Q. Okay. And where is that in relation to  
5 Krishnayapalem?  
6 A. Two hundred miles maybe.  
7 Q. Okay. So your father collects your revenues  
8 from that?  
9 A. Yes.  
10 Q. Okay. And how much have those revenues been?  
11 A. I don't know.  
12 Q. When did you receive those?  
13 A. I don't know.  
14 Q. You don't know how much you've received?  
11:14:03 15 A. I don't know.  
16 Q. Do you have even an estimate?  
17 A. I don't know.  
18 Q. No idea?  
19 A. No idea.  
20 Q. Is it clo- --  
21 MS. SATAGAJ: Objec- -- sorry, go ahead.  
22 Q. (By Mr. Freeman) Is it closer to \$1 or  
23 \$1,000?  
24 A. I don't know.  
25 Q. Is it more than \$1,000?

11:14:19 1 A. I don't know.  
2 Q. You don't know?  
3 MS. SATAGAJ: Objection, form.  
4 Q. (By Mr. Freeman) Is it more than 10,000?  
5 A. I don't know.  
6 Q. Is it more than 100,000?  
7 A. I don't know.  
8 MS. SATAGAJ: Objection, form.  
9 A. Because I -- I don't involve with that, so --  
10 Q. (By Mr. Freeman) You weren't involved in it?  
11 A. Yes.  
12 Q. What does your father do with the funds when  
13 they're paid to him?  
14 A. For the expenses.  
11:14:37 15 Q. What expenses?  
16 A. My father is very old, so --  
17 Q. Okay.  
18 A. My father and mother, so they need support,  
19 so --  
20 Q. Okay. So you tell your father to use those  
21 funds --  
22 A. Yes.  
23 Q. -- for whatever he wants?  
24 A. Yes.  
25 Q. Okay. But you don't know how much you've

11:14:52 1 received for that?

2 A. I don't know.

3 Q. Okay. Is this partnership -- is it in your  
4 name?

5 A. No.

6 Q. Okay. What evidence do you have to document  
7 that you entered into this partnership?

8 A. I already provided.

9 Q. And what -- what is that, what document?

10 A. It's a partnership deed.

11 Q. There's a partnership deed?

12 A. Yes.

13 Q. Okay. And who gave you that partnership  
14 deed?

11:15:16 15 A. Krishna Reddy.

16 Q. Krishna Reddy?

17 A. Uh-huh.

18 Q. And that's the individual --

19 A. The guy -- yeah.

20 Q. -- who you were a partner with?

21 A. Uh-huh.

22 Q. Okay. Did Krishna Reddy draft that  
23 partnership deed?

24 A. I don't know.

25 Q. Do you know who drafted it?

11:15:27 1 A. I don't know.  
2 Q. Did -- di you have no part in drafting it?  
3 A. I don't -- no.  
4 Q. Do you know when you first received that  
5 partnership deed?  
6 A. I don't recollect, but somewhere in 2016.  
7 Q. Okay. Did you ever receive that partnership  
8 deed electronically?  
9 A. I don't recollect.  
10 Q. Do you know if you ever received it via  
11 email?  
12 A. I don't recollect.  
13 Q. Okay. Which email address would that have  
14 been sent to if you received it by email?  
11:15:54 15 A. It could be bonibobj@gmail.com.  
16 Q. Okay.  
17 A. That's my personal use.  
18 Q. Okay. Is that who you -- is that the email  
19 you would use to correspond with Krishna Reddy?  
20 A. I -- I -- I -- that's for my personal use,  
21 yes.  
22 Q. Okay. Is there any other email address that  
23 you used to correspond with Krishna Reddy?  
24 A. No.  
25 Q. Do you correspond via email with Krishna

11:16:16 1 Reddy?

2 A. No.

3 Q. Have you ever?

4 A. No.

5 Q. Never?

6 A. No.

7 Q. Okay. And you have no idea how much money  
8 you've received from -- from the fish and chicken  
9 business?

10 A. That's correct.

11 MS. SATAGAJ: Objection, form.

12 Q. (By Mr. Freeman) Okay.

13 THE REPORTER: Okay. Hold on. Give just  
14 a second after the question so that your --

11:16:39 15 THE WITNESS: Okay.

16 THE REPORTER: -- attorney can --

17 THE WITNESS: Okay.

18 THE REPORTER: Thank you.

19 THE WITNESS: Okay.

20 Q. (By Mr. Freeman) Okay. Where are those funds  
21 actually deposited?

22 MS. SATAGAJ: Objection, form.

23 A. I -- I told you, my dad uses it, so I don't  
24 know how he uses it.

25 Q. (By Mr. Freeman) Are they deposited into a



11:16:53 1 bank account?

2 A. I don't know.

3 Q. Okay. Have you ever deposited any funds from  
4 that business into a bank account?

5 MS. SATAGAJ: Objection, form.

6 A. No.

7 Q. (By Mr. Freeman) Have you ever corresponded  
8 with Krishna Reddy regarding the partnership?

9 MS. SATAGAJ: Objection, form.

10 A. No.

11 Q. (By Mr. Freeman) When is the last time that  
12 you discussed this partnership with Krishna Reddy?

13 MS. SATAGAJ: Objection, form.

14 A. I don't recollect.

11:17:20 15 Q. (By Mr. Freeman) Did you discuss this  
16 partnership with Krishna Reddy this year?

17 A. No.

18 Q. Did you discuss this partnership with Krishna  
19 Reddy last year?

20 A. No.

21 Q. Did you discuss this partnership with Krishna  
22 Reddy in 2019?

23 A. I don't recollect.

24 Q. Did you discuss this partnership with Krishna  
25 Reddy in 2018?

11:17:38 1 MS. SATAGAJ: Objection, form.  
2 A. I don't recollect.  
3 Q. (By Mr. Freeman) Did you discuss it with  
4 Krishna Reddy in 2017?  
5 A. 2017, I might have, so --  
6 Q. Okay.  
7 A. Yeah.  
8 Q. So you believe the last time you discussed  
9 this partnership with Krishna Reddy was --  
10 A. Yeah.  
11 Q. -- 2017?  
12 A. Uh-huh.  
13 Q. Okay. Okay. And you paid \$150,000 --  
14 A. Yes.  
11:17:59 15 Q. -- even?  
16 A. I don't know the exact number, but it should  
17 be there in my -- under -- under one of the Excel.  
18 Q. Okay.  
19 A. So --  
20 Q. And was that via cash?  
21 A. Yes.  
22 Q. Okay. So there's -- where did that cash come  
23 from?  
24 A. From the properties which I sold.  
25 Q. Okay. From the buyers?

11:18:20 1 A. Yes.

2 Q. They paid you cash?

3 A. Yes.

4 Q. Did you ever report those sales on your tax

5 returns?

6 A. I don't have tax returns in India.

7 Q. Did you ever report them on your U.S. tax

8 returns?

9 MS. SATAGAJ: Objection, form.

10 A. No.

11 Q. (By Mr. Freeman) You didn't?

12 A. No.

13 Q. Why not?

14 MS. SATAGAJ: Objection, form.

11:18:42 15 A. I don't know.

16 Q. (By Mr. Freeman) Did you ever inform your

17 accountant of the sale of those properties?

18 A. No.

19 Q. Okay. Did you inform your accountant of any

20 other activity in India?

21 A. No.

22 MS. SATAGAJ: Objection, form.

23 Q. (By Mr. Freeman) Nothing?

24 A. No.

25 MS. SATAGAJ: Objec- --

11:19:00 1 Q. (By Mr. Freeman) Okay. So you -- you  
2 indicated with respect to the Krishnayapalem property,  
3 you went to a government office to execute the  
4 closing?

5 A. Yes.

6 Q. When was that?

7 A. Somewhere in 2018.

8 Q. In 2018?

9 A. Yes.

10 Q. Was that before or after the divorce?

11 A. Yes, that was after the divorce.

12 Q. After the divorce?

13 A. Yes.

14 Q. You --

11:19:27 15 A. But it was -- it was under contract in 2016.

16 Q. Okay.

17 A. So the property was sold in 2016.

18 Q. Okay.

19 A. But, you know, due to some issues -- local  
20 government issues, so I could not execute before. So  
21 I had to execute in 2018.

22 Q. Okay.

23 A. Technically it was sold in 2016.

24 Q. Okay. But in 2018, after the divorce, you  
25 executed the sale of the pro- -- of the property

11:19:53 1 located in Krishnayapalem?

2 A. Yes.

3 Q. Okay. And after the divorce in 2018, you  
4 closed on your sale of the Krishnayapalem property?

5 A. No. That's -- it was -- it's -- it's only  
6 the matter of the formality we had to close. It was  
7 already sold in 2016.

8 Q. Okay. But you executed the closing --

9 A. Yeah.

10 Q. -- documents?

11 A. Just a legal formality.

12 Q. Right.

13 A. Yeah.

14 Q. To transfer title?

11:20:17 15 A. Yes.

16 Q. Okay. So in 2018, you actually transferred  
17 title to the Krishnayapalem property?

18 A. Yes.

19 Q. And that was after the divorce?

20 A. Yes. Because the government had issues, so  
21 they didn't have the -- the title office running or  
22 some issues -- local government issues.

23 Q. Okay.

24 A. So I couldn't do it before.

25 Q. Okay. So the -- the Krishnayapalem property,

11:20:38 1     though, was -- you executed the closing documents in  
2     2018?

3             A.    Yes.

4             Q.    And that was after the divorce?

5             A.    Yes.

6             Q.    Okay.  What did you do then?

7             A.    Huh?

8             Q.    What did you do with -- after that, after you  
9     executed the closing documents?

10            A.    Nothing.

11            Q.    Did you -- what -- what did you do -- where  
12   did you go from there?

13            A.    I don't remember.

14            Q.    Okay.

11:21:03 15            A.    Yeah.

16            Q.    Did -- did you -- did you go anywhere with  
17   the seller -- or with the buyer?

18                    MS. SATAGAJ:  Objection, form.

19            Q.    (By Mr. Freeman) No?

20            A.    No.

21            Q.    Y'all parted ways?

22            A.    Yes.

23            Q.    And all that was done at the -- the  
24   government office?

25                    MS. SATAGAJ:  Objection, form.

11:21:17 1 A. (No verbal response.)

2 Q. (By Mr. Freeman) Okay. And where was this  
3 government office that you executed the closing  
4 documents for the Krishnayapalem property?

5 A. I don't remember the address.

6 Q. Okay.

7 A. So --

8 Q. Did you -- do you --

9 A. If you want, I can go to Google and find  
10 address, but I don't remember.

11 Q. Okay. Well, we may do that in a little bit,  
12 but --

13 A. Yeah.

14 Q. -- I want to know -- so how specifically did  
11:21:40 15 you get to that office?

16 MS. SATAGAJ: Objection, form.

17 A. I think I already told I went in a rental  
18 car.

19 Q. (By Mr. Freeman) Okay.

20 A. Yes.

21 Q. Where did you rent that car from?

22 MS. SATAGAJ: Objection.

23 A. In -- in a rental -- there are like a hundred  
24 rental car offices, so --

25 Q. (By Mr. Freeman) Right.

11:21:58 1 A. So I. --  
2 Q. And which one did you use?  
3 A. I don't remember. I don't have any  
4 information.  
5 Q. You don't know which one?  
6 A. Uh-huh.  
7 Q. Which rental car companies have you used that  
8 you -- that you remember?  
9 A. I don't recollect.  
10 Q. Yeah. Have you used Hertz?  
11 A. No.  
12 Q. Avis?  
13 A. No.  
14 Q. Any -- any other company that you know of?  
11:22:19 15 A. I don't remember.  
16 Q. Nothing?  
17 A. Yeah.  
18 Q. What city was that rental car company or  
19 business located in?  
20 MS. SATAGAJ: Objection, form.  
21 A. It's Hyderabad. I don't know.  
22 Q. (By Mr. Freeman) Hyderabad?  
23 A. Yeah.  
24 Q. Okay. What is Hyderabad?  
25 A. It's a city.



11:22:39 1 Q. Okay. Where is that in relation to  
2 Krishnayapalem?

3 A. It's like maybe 150, 200 miles away.

4 Q. Okay. Were you staying in Hyderabad at that  
5 time?

6 A. Yes.

7 Q. And where do you stay in Hyderabad?

8 A. In Hyderabad, Opal. Opal.

9 Q. Opal?

10 A. Uh-huh.

11 Q. What is Opal?

12 A. It's a -- it's a local -- it's a local, you  
13 know, suburban to Hyderabad.

14 Q. Okay. And why are you staying --

11:23:08 15 THE REPORTER: Wait. I'm sorry. I --

16 THE WITNESS: Opal.

17 THE REPORTER: I got that, but --

18 THE WITNESS: Yeah.

19 THE REPORTER: It's a local, you know ---

20 THE WITNESS: Local town.

21 THE REPORTER: Yeah, thank you.

22 Q. (By Mr. Freeman) And why did you stay in  
23 Opal?

24 A. My sister lives there. My brother-in-law and  
25 sister.

11:23:16 1 Q. So you stayed with your sister and  
2 brother-in-law?  
3 A. Yes.  
4 Q. And who are they?  
5 A. My -- my brother-in-law is a doctor.  
6 Q. Okay. What's his name?  
7 A. Bhumesh Kumar.  
8 Q. How do you spell that?  
9 A. B-h-u-m-e-s-h.  
10 Q. Okay. And what is your sister's --  
11 A. Kumar Laxmi.  
12 Q. How do you spell that?  
13 A. L-a-x-m-i.  
14 Q. Okay. Laxmi?  
11:23:38 15 A. Yeah.  
16 Q. So you stayed with them --  
17 A. Yes.  
18 Q. -- in -- in Opal?  
19 A. Yes.  
20 Q. Which is within Hyderabad?  
21 A. Yes.  
22 Q. And you rented a car?  
23 A. Yes.  
24 Q. And you drove that car to Krishnayapalem?  
25 A. Somebody else drove. I cannot drive.

11:23:53 1 Q. Someone else drove?

2 A. Yeah.

3 Q. So does -- the rental car company, does it  
4 provide the driver?

5 A. Yes.

6 Q. Okay. And did you pay for that?

7 A. Yes.

8 Q. Okay. And how did you pay for that?

9 MS. SATAGAJ: Objection, form.

10 A. Cash.

11 Q. (By Mr. Freeman) You paid cash?

12 A. Yes.

13 Q. Okay. So is there no documented record of  
14 that?

11:24:12 15 A. That's correct.

16 Q. Okay. How long did you stay with your sister  
17 and brother-in-law in Opal?

18 A. I don't remember.

19 Q. Okay. Was it a day, or was it a week, or was  
20 it more?

21 A. I don't know.

22 MS. SATAGAJ: Objection, form.

23 Q. (By Mr. Freeman) You don't remember?

24 A. Uh-huh.

25 Q. What -- what documentation would there be of

11:24:30 1 your stay there?

2 A. I don't have anything. It's my sister, so  
3 it's a family.

4 Q. Okay. Do you have any email correspondence  
5 with them about the trip?

6 A. No.

7 Q. Did you discuss the trip with them prior to  
8 you going there?

9 MS. SATAGAJ: Objection, form.

10 A. Yes. They know about my trip.

11 Q. (By Mr. Freeman) Okay. And when did you  
12 discuss that with them?

13 A. I don't remember.

14 Q. How did you discuss it?

11:25:01 15 MS. SATAGAJ: Objection, form.

16 A. I don't know.

17 Q. (By Mr. Freeman) Did you discuss it with them  
18 by email?

19 A. I don't know.

20 Q. Did you discuss it with them by text message?

21 A. I don't know.

22 MS. SATAGAJ: Obje- --

23 Q. (By Mr. Freeman) Did you discuss it with them  
24 by phone?

25 MS. SATAGAJ: Objection, form.

11:25:15 1 A. I don't know.

2 Q. (By Mr. Freeman) And you don't know how long  
3 you stayed there?

4 A. I don't know.

5 Q. Did you take a flight to India?

6 A. Yes.

7 Q. Okay. What airline did you use?

8 A. I don't remember.

9 Q. Okay. Do you have any records of your flight  
10 to India?

11 A. No.

12 Q. Why not?

13 A. I don't keep the records.

14 Q. Okay.

11:25:35 15 A. I mean, it's -- it's not relevant, so I don't  
16 have it.

17 Q. Okay. So you have no records that would  
18 demonstrate that you actually flew to India in 2018 to  
19 stay with your -- your sister and brother-in-law?

20 A. Yeah.

21 Q. Okay. And that -- that trip was sometime in  
22 2018 after the divorce?

23 A. Yes.

24 Q. Okay. And you have no records to document  
25 that you rented a car in Hyderabad?

11:26:04 1 A. Correct.

2 Q. And no records to document that you -- that  
3 car was driven to -- to Medak?

4 A. Yes.

5 Q. Okay. And you don't know where the office  
6 was that you went to in Medak?

7 MS. SATAGAJ: Objection, form.

8 A. It's Krishnayapalem, not Medak.

9 Q. (By Mr. Freeman) Okay.

10 A. So I don't have -- I don't know. I don't  
11 remember.

12 Q. Okay. So you have no records to demonstrate  
13 that you drove from Opal or Hyderabad to  
14 Krishnayapalem, correct?

11:26:38 15 A. Correct.

16 Q. And you have no records to -- to demonstrate  
17 that you went to the government office in  
18 Krishnayapalem; is that correct?

19 A. Yes.

20 Q. Okay. Did you pay anything to the government  
21 office in Krishnayapalem when you were there?

22 A. No.

23 Q. Did they need a fee for any of the documents  
24 that you executed?

25 A. That's -- buyer does all that, so I have -- I

11:27:07 1 don't have to spend anything.

2 Q. Okay. Was there a notary there to witness  
3 your execution of those documents?

4 A. Should be there in the sale deed, I think.

5 Q. Okay.

6 A. Or like in the EC -- you know, in the  
7 Encumbrance Certificate.

8 Q. (By Mr. Freeman) Did you know that notary?

9 A. No.

10 Q. Okay. What other documentation do you have  
11 that would demonstrate that you went to Hyderabad in  
12 2018 and went from there to Krishnayapalem?

13 A. I don't have anything.

14 Q. No records?

11:27:41 15 A. No.

16 Q. Okay. Mr. Chintam, have you -- you -- you  
17 testified that you -- you have several email  
18 addresses. Have you checked all of those email  
19 addresses for any correspondence related to these  
20 properties?

21 MS. SATAGAJ: Objection, form.

22 A. No.

23 Q. (By Mr. Freeman) You have not?

24 A. No.

25 Q. Why not?

11:28:06 1 A. I don't have -- I don't have any  
2 correspondence in the email.

3 Q. Have you run any kind of check to see if  
4 there are any emails related to these properties?

5 A. No. I did not have -- have a need for that,  
6 so I -- no.

7 Q. So you didn't run any check within any of  
8 your emails to determine if there was any  
9 correspondence related to the Krishnayapalem property,  
10 the Pangra property, the Bongloor property, the  
11 Miyapur property, or the Mubarak Nagar property?

12 A. Yes.

13 Q. And you didn't run any check to see if there  
14 were any documents in your emails related to any of  
11:28:38 15 those properties?

16 MS. SATAGAJ: Objection, form.

17 A. No. So I have -- I've given all the  
18 documentation to my attorney.

19 Q. (By Mr. Freeman) Okay. And where did you get  
20 that documentation?

21 A. Where -- where did I get the documentation?

22 Q. Correct.

23 A. Yeah, so by -- through -- through the mail.

24 Q. Okay.

25 A. Postal.



11:28:54 1 Q. So everything you do is by mail --

2 A. Yes.

3 Q. -- with them?

4 Why is that?

5 A. Yeah, I mean, they -- they don't use, you  
6 know, online, so they send me through the -- through  
7 postal, so --

8 Q. All right. Are you saying they don't have  
9 internet --

10 A. Yeah, email.

11 Q. -- in India?

12 A. No, no. Internet is there, but it's not --  
13 it came through -- you know, mostly it came through  
14 the postal. Maybe a couple of them might come through  
11:29:19 15 email, so --

16 Q. Okay. Have --

17 A. -- I don't --

18 Q. Have you checked your emails for any of  
19 those?

20 A. No.

21 Q. Okay. Why not?

22 A. I didn't have a need for that, so --

23 Q. Why did you not have a need for that?

24 A. So why should I check?

25 Q. So you haven't checked your email for any

11:29:36 1 documentation relevant to this case?

2 A. Yeah, why should I check? I'm asking you.

3 MS. SATAGAJ: Objection, nonresponsive.

4 Q. (By Mr. Freeman) You have not checked your  
5 emails to see whether there's any documentation  
6 relevant to this case?

7 A. I ha- -- I have no need for that, so --

8 Q. So you --

9 A. -- I give all the documentation to my  
10 attorney, so they got everything.

11 Q. Okay. Just the documentation you got via  
12 mail, correct?

13 A. Yeah, mail and some emails, so --

14 Q. Oh, okay. Did you check your emails for any  
11:30:04 15 documentation relevant to this case, or did you not  
16 feel a need to do so?

17 A. I did not --

18 MS. SATAGAJ: Objection, form.

19 A. I did not have any need.

20 Q. (By Mr. Freeman) So -- so you had no need to  
21 check your emails to see whether there were any  
22 documents relevant to this case?

23 A. Yes.

24 Q. And so we don't know if you have any emails  
25 related to the Krishnayapalem property?

11:30:22 1 A. Uh-huh.

2 Q. And we don't know if you have any emails  
3 related to the Pangra property?

4 A. Yes.

5 Q. That's correct, we don't know?

6 A. Yeah, I don't know. I mean, I -- I don't  
7 keep track of the -- all the things, so --

8 Q. Okay. And we have no way to know if you have  
9 any emails related to the Bongloor property?

10 A. I don't know. I gave -- I gave the  
11 documentation, so I have no need to -- to check.

12 Q. But no documentation from your emails,  
13 correct?

14 A. Yeah, what is the point of that?

11:30:46 15 Q. You didn't feel like you needed to do that,  
16 correct?

17 A. Yes.

18 Q. Okay.

19 A. Because I gave everything, so they have  
20 everything, so --

21 Q. Okay.

22 A. Yeah.

23 Q. Did you ever -- and we don't know if you have  
24 any emails related to the Miyapur property; is that  
25 correct?

11:31:01 1 A. Yes. I -- I mean, I gave everything, all  
2 the --  
3 Q. But you didn't give them any --  
4 A. -- documentation.  
5 Q. -- emails; is that correct?  
6 A. To whom?  
7 Q. To your attorney.  
8 A. I -- I -- I sent emails to my attorney.  
9 Q. Okay.  
10 A. Yeah.  
11 Q. How did you come across those emails?  
12 A. What do you mean?  
13 Q. Well, how did you --  
14 A. I don't understand.  
11:31:16 15 Q. How did you know you had an email?  
16 A. Oh, I -- I've -- from my computer, I send it?  
17 Q. Correct.  
18 A. Yeah.  
19 Q. Okay. How did you know that you had an email  
20 related to this case?  
21 A. It's there in my computer.  
22 Q. Okay. And so you just knew it existed?  
23 A. Yes.  
24 Q. You didn't go search for it, you just knew?  
25 A. No.

11:31:37 1 Q. Because you have a good memory?  
2 A. No. In -- in my computer, I have it, so --  
3 Q. So you knew it was there, and you pull- --  
4 A. My computer, I -- I send them all the  
5 documentation.  
6 Q. You pulled what you remembered?  
7 A. I found it, yeah, in my computer.  
8 Q. But you didn't run a search for any of it,  
9 correct?  
10 A. I had to search.  
11 Q. Okay. What did you search for?  
12 A. For the properties -- India properties.  
13 Q. Okay. So let's please get this straight.  
14 Did you run a search on your emails for --  
11:32:04 15 A. No. On my computer.  
16 Q. Okay. Just on your computer?  
17 A. Uh-huh.  
18 Q. So it's -- it's only going to be if it's on  
19 the hard drive on your computer?  
20 A. Yes.  
21 Q. Okay. With respect to your computer, how  
22 many hard drives do you have?  
23 A. I have one hard drive.  
24 Q. Just one hard drive?  
25 A. Uh-huh.

11:32:19 1 Q. How much room does it have?  
2 A. I -- I don't remember.  
3 Q. Is it like a terabyte? Two terabytes?  
4 A. I don't remember.  
5 MS. SATAGAJ: Objection, form.  
6 Q. (By Mr. Freeman) Okay. Do you maintain  
7 records on any other platform?  
8 MS. SATAGAJ: Obj- --  
9 A. No.  
10 Q. (By Mr. Freeman) Do you have an iPad?  
11 A. Yes.  
12 Q. Okay. Do you have a phone?  
13 A. Yes.  
14 Q. Okay. Do you maintain any records on those?  
11:32:40 15 A. No.  
16 Q. Nothing?  
17 Okay. Do you use Dropbox?  
18 A. No.  
19 Q. You use Box.com?  
20 A. No.  
21 Q. Do you use any other cloud storage?  
22 A. No.  
23 Q. Do you know what I mean by "cloud storage"?  
24 A. Yes.  
25 Q. Okay. So you don't use any other third

11:32:57 1 party, only what is on your hard drive?

2 A. Yes.

3 Q. Do you store any documents in -- with Google?

4 A. No.

5 Q. Do you use Gmail?

6 A. Yes.

7 Q. Okay. Are there any documents in your Gmail?

8 A. I mean, the documents that I sent, I send it  
9 to my attorney, so --

10 Q. Okay.

11 A. Yeah.

12 Q. Okay. And is it your position you have no  
13 correspondence related to the Krishnayapalem property?

14 A. Yes.

11:33:24 15 Q. Okay. And it's your position you have no  
16 correspondence related to the Pangra property?

17 A. When you say "no correspondence," with whom?

18 Q. With anyone.

19 A. No. I mean, I communicated with my --

20 Q. Besides your --

21 A. -- attorney.

22 Q. Besides your attorney.

23 A. Yeah, besides my attorney, no.

24 Q. No one?

25 A. Yeah.

11:33:39 1 Q. Okay. And it's your position that you have  
2 no correspondence with anyone other than your attorney  
3 regarding the Bongloor property?

4 A. Yes.

5 Q. And it's your position that you have no  
6 correspondence with anyone other than your attorney  
7 regarding the Miyapur property?

8 A. Yes.

9 Q. And it's your position that you have no  
10 correspondence with anyone other than your attorney  
11 except for the Mubarak -- related to the Mubarak Nagar  
12 property?

13 A. Yes.

14 Q. Okay. Do you have any correspondence with  
11:34:02 15 anyone related -- other than your attorney related to  
16 the ICIC Bank accounts at issue in this case?

17 A. No.

18 Q. Okay. With respect to the lawsuits that you  
19 were involved in in India, what were the claims that  
20 were made by the plaintiffs?

21 A. You know, not able to transition them on  
22 time.

23 Q. Okay. And what do you mean by "transition  
24 them"?

25 A. Like closing.



11:34:31 1 Q. Okay. And that's closing on what?

2 A. Closing the property.

3 Q. Okay. And those are the properties at issue  
4 in this case?

5 A. Yes.

6 Q. Okay. Tell me about the properties,  
7 specifically the Krishnayapalem property. Did Mydam  
8 Rajann-- Rajanna sue you in India?

9 A. Yes.

10 Q. And he sued you related to the Krishnayapalem  
11 property?

12 A. Yes.

13 Q. And his claim was that you had failed to  
14 close on that property?

11:35:03 15 A. Yes.

16 Q. To transfer ownership to him, correct?

17 A. Yeah. Sale process closing, yes.

18 Q. Okay. And how much money did you spend on  
19 that lawsuit?

20 MS. SATAGAJ: Objection, form.

21 A. I don't remember.

22 Q. (By Mr. Freeman) Did you hire an attorney to  
23 represent you in that lawsuit?

24 A. Yes.

25 Q. Who was that attorney?

11:35:24 1 A. I don't remember his name.

2 Q. Okay. Do you have any records related to  
3 hiring that attorney?

4 A. I don't have, huh-uh.

5 Q. What city did that attorney work out of?

6 A. I don't know.

7 Q. Okay. Had you ever worked with that attorney  
8 before?

9 A. No.

10 Q. Did you ever speak to that attorney?

11 A. No. I mean, after the case was closed, it  
12 was done, so --

13 Q. Did you ever email that attorney?

14 A. No.

11:35:48 15 Q. Did you ever pay that attorney?

16 A. Yes.

17 Q. How did you pay that attorney?

18 A. Cash.

19 Q. So you -- where did you get that cash from?

20 A. The cash, like I got -- I got the cash from  
21 the properties which I sold.

22 Q. Okay. And when did you receive that cash?

23 A. I don't remember. It's -- it's in the  
24 documentation.

25 Q. Okay.

11:36:11 1 A. So --

2 Q. Did you receive it at the same time you hired

3 that attorney --

4 A. No.

5 Q. -- or long before?

6 A. No, cash came before, so --

7 Q. Okay. Where did you store that cash?

8 A. My dad --

9 Q. Okay. Does -- where does your dad store that

10 cash for you?

11 A. Ecunbrabur.

12 Q. Excuse me?

13 A. Ecunbrabur, in my village, in my home.

14 Q. And can you spell that?

11:36:32 15 A. It's E-c-u-n-b-r-a-b-u-r.

16 Q. And what is that?

17 A. It's a village, town.

18 Q. Okay. So he stores it in a village?

19 A. Yes.

20 Q. Where within that village?

21 A. In my home.

22 Q. In your home?

23 A. Yes.

24 Q. You have a home --

25 A. Yes.

11:36:46 1 Q. -- there?  
2 A. Yes.  
3 Q. Is it your home?  
4 A. My dad's home.  
5 Q. Your dad's home?  
6 A. Yes.  
7 Q. And he stores your cash in his home?  
8 A. Yes.  
9 Q. Does he have a safe?  
10 A. I mean, it's a different kind of safe, so --  
11 Q. What does he store it in at that home?  
12 A. What is it?  
13 Q. What does he store your cash in at that home?  
14 A. It's -- we have a small room, so --  
11:37:10 15 Q. Okay. So does he just put it in a room?  
16 A. Yes.  
17 Q. Does he lock that room?  
18 A. Yes.  
19 Q. Okay. How much cash is he storing for you in  
20 that room right now?  
21 MS. SATAGAJ: Objection, form.  
22 A. I don't know.  
23 Q. (By Mr. Freeman) Give me your best estimate.  
24 A. I don't know.  
25 Q. Is it \$10?

11:37:26 1 MS. SATAGAJ: Objection, form.  
2 A. I don't know.  
3 Q. (By Mr. Freeman) Is it more than 1,000?  
4 MS. SATAGAJ: Objection, form.  
5 A. I don't know.  
6 Q. (By Mr. Freeman) Is it more than 10,000?  
7 MS. SATAGAJ: Objection, form.  
8 A. I don't know.  
9 Q. (By Mr. Freeman) Is it more than 50,000?  
10 A. I don't know.  
11 Q. Is it more than 100,000?  
12 MS. SATAGAJ: Objection, form.  
13 A. I don't know.  
14 Q. (By Mr. Freeman) Is it more that a million  
11:37:41 15 dollars?  
16 MS. SATAGAJ: Objection, form.  
17 A. I don't know.  
18 Q. (By Mr. Freeman) Is it more than two million?  
19 MS. SATAGAJ: Objection, form.  
20 A. I don't know.  
21 Q. (By Mr. Freeman) Is it more than five  
22 million?  
23 MS. SATAGAJ: Objection, form.  
24 A. I don't know.  
25 Q. (By Mr. Freeman) Is it more than ten million?

11:37:51 1 MS. SATAGAJ: Objection, form.

2 A. I don't know.

3 Q. You truly don't know if he's storing more  
4 than \$10 million for you?

5 A. I don't know.

6 MS. SATAGAJ: Objection, form.

7 Q. (By Mr. Freeman) So you think it's possible  
8 he's storing more than \$10 million for you?

9 A. I don't know.

10 Q. Have you --

11 MS. SATAGAJ: Objection, form.

12 Q. (By Mr. Freeman) Have you ever had -- known  
13 that you had more than 10,000 -- \$10 million stored  
14 with your father?

11:38:09 15 A. I don't know.

16 MS. SATAGAJ: Objection, form.

17 Q. (By Mr. Freeman) Okay. So it's possible that  
18 he stores more than \$10 million for you?

19 A. I don't know.

20 MS. SATAGAJ: Objection, form.

21 Q. (By Mr. Freeman) Why do you not know?

22 A. I have no idea, so --

23 Q. Okay. So these proceedings brought against  
24 you by Mydam Rajanna, did you ever appear in court?

25 A. No.

11:38:34 1 Q. Okay. Tell me what proceedings occurred.  
2 A. It's a -- it's a code judgment.  
3 Q. Okay.  
4 A. It's a local code.  
5 Q. Okay. Did you fail to appear with the court?  
6 A. Yeah. My -- my dad appeared on behalf of me.  
7 Q. Okay. So your father went --  
8 A. Yes.  
9 Q. -- there and --  
10 A. Yes.  
11 Q. -- appeared for you?  
12 A. Yes.  
13 Q. And what did your father do there?  
14 A. Yeah. I mean, he accepted like, you know, my  
11:38:57 15 son, you know, could not do on time, so it's basically  
16 the Court instructed us to, you know, transfer the  
17 deed once the process opens up.  
18 Q. Okay.  
19 A. So --  
20 Q. Were you upset with your father for doing  
21 that?  
22 A. No.  
23 Q. Did you ask your father to do that?  
24 A. Yes.  
25 Q. Okay. Did you instruct him to do that?

11:39:17 1 A. Yes. Because I failed to do -- do it on  
2 time, so --

3 Q. Okay. And so you had failed to transfer the  
4 property to Rajanna?

5 A. Yes.

6 Q. Okay.

7 A. On time.

8 Q. All right.

9 A. (Indiscernible) the time.

10 Q. And you ended up transferring the  
11 Krishnayapalem property to Rajanna after the divorce,  
12 correct?

13 A. Yes.

14 Q. Okay. Did -- is your father an attorney?

11:39:43 15 A. No.

16 Q. How was he able to appear for you in court?

17 MS. SATAGAJ: Objection, form.

18 A. I don't understand your question.

19 Q. (By Mr. Freeman) Was -- how was -- why was  
20 your father authorized to appear for you in court?

21 A. I mean, he is my father, so I -- I -- I  
22 designate him, so --

23 Q. Okay.

24 A. Yeah.

25 Q. Okay. Is he your power of attorney?



11:40:08 1 A. I mean, he has all the rights.

2 Q. Okay. How does he have those rights?

3 A. He's my father.

4 Q. Okay. And how was he able to appear for you  
5 in that court?

6 A. I mean, I -- I told my father to go and, you  
7 know, present on behalf of me, so --

8 Q. Okay. And what did your father say in  
9 response that request?

10 A. Can you please repeat?

11 Q. What was your father's reaction to that  
12 request?

13 A. Oh, I mean, he told me you should have done  
14 it on time, but, you know, due to circumstances, we --  
11:40:42 15 I could not do it. Well, you know, it's all over now,  
16 so --

17 Q. Okay. And how did your father get to that  
18 court?

19 MS. SATAGAJ: Objection, form.

20 A. He -- yeah, he went in a car.

21 Q. (By Mr. Freeman) Okay. Does your father own  
22 a car?

23 MS. SATAGAJ: Objection --

24 A. No.

25 MS. SATAGAJ: -- form.

11:40:57 1 Q. (By Mr. Freeman) How did he get there then?

2 MS. SATAGAJ: Objection, form.

3 A. He went in a car, so --

4 Q. (By Mr. Freeman) Did he rent a car?

5 A. I don't know how he went, but I know for sure  
6 he went in a car, so --

7 Q. Okay. What was your relationship to -- to  
8 Mydam Rajanna?

9 A. No relationship.

10 Q. No relationship at all?

11 Was -- how long had you known him?

12 A. Oh, I know him -- I've -- he's in -- from my  
13 same village, so I know him, you know, pretty long  
14 time, so --

11:41:25 15 Q. Have y'all ever been partners in anything?

16 A. No.

17 Q. Have y'all ever shared ownership in anything?

18 A. No.

19 Q. Have you ever loaned him money?

20 MS. SATAGAJ: Objection --

21 A. No.

22 MS. SATAGAJ: -- form.

23 Q. (By Mr. Freeman) Has he ever loaned you  
24 money?

25 MS. SATAGAJ: Objection --

11:41:37 1

A. No.

2

MS. SATAGAJ: -- form.

3

Q. (By Mr. Freeman) Okay. So no financial

4

relationship ever?

5

A. Yes.

6

Q. Okay. And did that case end?

7

A. Yes.

8

Q. When did that case end?

9

A. Yeah, after the -- you know, after the

10

transition happened, so --

11

Q. Okay.

12

A. Yeah.

13

Q. Was that after the divorce?

14

A. No. The case actually judged in -- during

11:41:57 15

the divorce time, so only the execution of the sale

16

did happen later, but the -- the case was closed even

17

before the divorce.

18

Q. Okay.

19

A. Yeah.

20

Q. Did you have to pay any costs related to that

21

case?

22

A. To whom?

23

Q. Related to that case, did you have to pay any

24

costs to anyone?

25

A. To pay to whom?

11:42:16 1 Q. Anyone.  
2 A. I paid to attorney.  
3 Q. Right.  
4 A. Yes.  
5 Q. Why didn't the attorney appear for you in  
6 court?  
7 A. What is that?  
8 Q. Why did the attorney not appear for you --  
9 A. No --  
10 Q. -- in court?  
11 A. -- the attorney was there, too.  
12 Q. Okay. I thought you said your father  
13 represented you.  
14 A. Yeah, my -- my father and attorney both,  
11:42:32 15 so --  
16 Q. Okay. Tell me about the other case. You  
17 said there were two cases?  
18 A. Yes.  
19 Q. Okay. Boddu Sayanna?  
20 A. Yes.  
21 Q. Did he sue you?  
22 A. Yes.  
23 Q. And did he sue you over the Pangra property?  
24 A. Yes.  
25 Q. When did he sue you?

11:42:47 1 A. I don't remember. Somewhere in 2016, I  
2 think, 2017.

3 Q. When did you first learn that he was suing  
4 you?

5 A. I don't recollect exact time.

6 Q. When was the last time you had spoken to him  
7 prior to that lawsuit?

8 A. Only during the contract.

9 Q. Dur- -- in 2016 then?

10 A. Yeah, 2016.

11 Q. So you didn't speak to him after that until  
12 he sued you?

13 A. Yes.

14 Q. Okay. And he sued you over the Pangra  
11:43:15 15 property?

16 A. Yes.

17 Q. How much was the -- well, when did you enter  
18 the contract for the Pangra property?

19 A. 2016.

20 Q. Okay. And did you execute that contract  
21 directly with Mr. Sayanna?

22 A. Yes.

23 Q. Okay. Where were y'all when you executed  
24 that contract?

25 A. I was in my village.

11:43:34 1 Q. Okay. Which village?  
2 A. Sikinjapoor.  
3 Q. Sikinjapoor?  
4 A. Uh-huh.  
5 Q. Okay. Is that where Mr. Sayanna lives?  
6 A. No.  
7 Q. Where does Mr. Sayanna live?  
8 A. He lives in a different village.  
9 Q. Okay. Which village?  
10 A. Manthaj Bali.  
11 Q. Where is that in relation to your village?  
12 A. It's like -- I guess like 12 kilometers.  
13 Q. Okay. So close; is --  
14 A. Yes.  
11:43:55 15 Q. -- that correct?  
16 A. Yes.  
17 Q. Okay. He came to your village?  
18 A. Yes.  
19 Q. Whose house or what location were you at to  
20 execute this contract?  
21 MS. SATAGAJ: Objection, form.  
22 A. My house.  
23 Q. (By Mr. Freeman) And which house is that?  
24 A. My -- my dad's house.  
25 Q. Your -- your father's house?

11:44:12 1 A. Yes.

2 Q. Okay. So you executed that at your father's  
3 house?

4 A. Yes.

5 Q. With Mr. Sayanna?

6 A. Yes.

7 Q. Okay. Do you have a copy -- did you have an  
8 electronic copy of that --

9 A. Yes.

10 Q. -- contract?

11 A. I have -- with my attorney. I gave it to my  
12 attorney.

13 Q. Okay. Did you ever receive that contract  
14 prior to the date that you executed it?

11:44:35 15 A. No.

16 Q. So you didn't have an electronic copy --

17 A. No.

18 Q. -- prior to then?

19 When did you first make a copy of that  
20 document?

21 A. I don't remember.

22 Q. Okay. Was it after the divorce?

23 A. No.

24 Q. Was it was before the divorce?

25 A. Yes.

11:44:50 1 Q. So you made an electronic copy --  
2 A. I don't remember.  
3 Q. -- before the divorce?  
4 A. Maybe, yeah.  
5 Q. Okay. Who was there to witness you execute  
6 that contract?  
7 A. It should be there in that one. I don't  
8 remember.  
9 Q. Okay. How many people were there, do you  
10 remember?  
11 A. Huh-uh.  
12 Q. No?  
13 Do you remember any other circumstances  
14 related to the execution of that contract?  
11:45:14 15 A. No.  
16 Q. No?  
17 Do you remember what room you were in?  
18 A. In my house.  
19 Q. Okay. Just in your house?  
20 A. Yes.  
21 Q. Are we talking the kitchen table?  
22 A. No. It's --  
23 MS. SATAGAJ: Objection, form.  
24 A. It's a living room.  
25 Q. (By Mr. Freeman) Okay. In the living room?



11:45:25 1 A. Yes.

2 Q. And who was sitting around in the living

3 room?

4 A. I don't remember.

5 Q. Okay. Were there a number of people?

6 A. Maybe, yeah. I don't --

7 Q. Okay.

8 A. I don't know how many, but yeah.

9 Q. Okay. Did any money change hands at that

10 time?

11 A. Yes.

12 Q. Okay. How much?

13 A. I don't remember.

14 Q. Okay.

11:45:42 15 A. It should be there in the contract, if you

16 have a minute.

17 Q. Okay. It's the exact amount stated in the

18 contract?

19 A. Yes.

20 Q. Okay. Do you recall an estimate of how much

21 that was?

22 A. No.

23 Q. You don't know if that was \$10?

24 A. No. It should be --

25 Q. That's okay. I just --

11:45:59 1 A. Can I --

2 Q. I want to know --

3 A. Yeah.

4 Q. -- how much you recall receiving?

5 A. I don't recall, but it should -- it's there

6 in the contract, and (overtalk.)

7 Q. Was it more than \$1,000?

8 A. For sure, yes.

9 Q. All right. Was it more than \$100,000?

10 A. I don't know that. I don't know.

11 Q. How much do you believe that property was

12 worth?

13 A. I -- I -- I don't know. It's like -- I don't

14 know how much.

11:46:22 15 Q. Okay.

16 A. It's like 12 lacs or 15 lacs, that way.

17 Q. What does that equate to?

18 A. It's \$18,000 maybe, something like that.

19 Q. Eighteen?

20 A. Yes.

21 Q. Okay. \$18,000?

22 A. Uh-huh.

23 Q. So that's about what you would expect to have

24 received as a result of that?

25 A. Yes.

11:46:40 1 Q. Okay. Where did -- how did you receive that?

2 A. By cash.

3 Q. Okay. So Mr. Sayanna also paid you in cash?

4 A. Yes.

5 Q. And what did you do with that cash?

6 A. I invested in the same, for my fish and  
7 chicken business.

8 Q. So you also put that money in --

9 A. Yes.

10 Q. -- the fish and chicken business?

11 A. Yes.

12 Q. Okay. But you have no record of putting that  
13 money into the fish and chicken business?

14 A. No. It's a cash.

11:47:03 15 Q. No documentation to demonstrate that?

16 A. No, documentation is there. We have a  
17 partnership deed.

18 Q. Have -- have you disclosed Krishna Reddy as  
19 a -- as a relevant person in this case?

20 A. In this case?

21 Q. Yes, sir.

22 A. No.

23 Q. Can you tell me, do -- do you have Krishna  
24 Reddy's contact information?

25 A. No. I -- I mean I have it, but I -- I -- I

11:47:31 1 have it.

2 Q. Okay. Do you mind, can you provide --

3 A. No.

4 Q. -- that to me?

5 A. No.

6 Q. Why not?

7 A. Well, why should I provide it? It's -- it's  
8 not part of this case.

9 Q. It -- sir, I'm asking you to provide me with  
10 the contact information for Krishna Reddy.

11 A. I'm not providing.

12 Q. Are you -- are you refusing to --

13 A. Yes.

14 Q. -- provide that?

11:47:48 15 A. Yes.

16 Q. Okay. But you know it?

17 A. Yes.

18 Q. But you won't provide it?

19 A. Yes.

20 Q. Okay.

21 A. Because it's -- you know, it's not part of  
22 this, so --

23 Q. Okay. Who else -- who -- who else is  
24 partners with Krishna Reddy?

25 A. Just two of us.

11:48:06 1 Q. Okay. And no one else was a witness to you  
2 becoming a partner?

3 A. It should be there in the document.

4 Q. Okay.

5 A. Yes.

6 Q. Do you -- do you -- does anyone else know  
7 about your partnership interest?

8 A. My -- my family knows.

9 Q. Just your -- your father --

10 A. Yes.

11 Q. -- and your mother?

12 A. Yes.

13 Q. Does anyone else know?

14 A. No.

11:48:30 15 Q. Had you ever told anyone else that you were a  
16 partner?

17 A. No.

18 Q. So no one else other than your father and  
19 your mother --

20 A. Yes.

21 Q. -- know that you're a partner in the fish and  
22 chicken business?

23 A. And my attorney basically.

24 Q. And your attorney?

25 A. Yes.

11:48:43 1 Q. All right. But you've never --  
2 A. And Deepa. Deepa knows.  
3 Q. And Deepa?  
4 A. Yes.  
5 Q. Okay. But you have never discussed it with  
6 anyone else?  
7 A. That's correct.  
8 MS. SATAGAJ: Objection, form.  
9 A. No.  
10 Q. (By Mr. Freeman) Okay. And how did the --  
11 how did the case related to the Pangra property end?  
12 A. I -- I went there to settle it.  
13 Q. Okay. Were there proceedings -- court  
14 proceedings?  
11:49:07 15 A. Yes.  
16 Q. And did you appear there in person?  
17 A. Yes.  
18 Q. Okay. And who else appeared in person?  
19 A. Boddu Sayanna.  
20 Q. Okay. And was anyone else there?  
21 A. I -- I'm sure there are, but I don't  
22 remember.  
23 Q. Were you represented by an attorney?  
24 A. No. I was just by myself.  
25 Q. So you represented yourself in that

11:49:23 1 proceeding?

2 A. Yes.

3 Q. Why did you not use an attorney?

4 A. I mean, I was -- I went there, so --

5 Q. Okay. And what were you accused of in that?

6 A. Me -- me?

7 Q. Yes, sir.

8 A. So -- yeah. So I -- I couldn't -- you know,

9 I took the money. I didn't transfer on time, so --

10 Q. Okay.

11 A. Uh-huh.

12 Q. So --

13 A. And there was a -- you know, it should be the

14 passbook, so we did not have a passbook handy in order

11:49:47 15 to execute that.

16 Q. Okay.

17 A. So that got delayed, so it --

18 Q. Okay.

19 A. -- caused the problem.

20 Q. Okay. That wasn't really your fault?

21 A. I mean, it is my fault only because of -- you

22 know, when I took the money from somebody else, I was

23 supposed to close it on time. But, you know, I -- I

24 did not have all the documentation, like the passbook

25 you call it.

11:50:07 1 Q. Uh-huh.

2 A. So because of that, it got delayed and --

3 Q. Okay.

4 A. Yeah.

5 Q. Got it.

6 And -- and how -- what was the Court's  
7 ruling in that case?

8 A. Yeah, the Court ruled to transfer -- I mean,  
9 you know, do the closing process as soon as possible  
10 after I got the passbook.

11 Q. Okay. Do you have access to any of Deepa's  
12 email addresses?

13 A. No.

14 Q. Have you ever had access to any of her email  
11:50:32 15 addresses?

16 A. Yes.

17 Q. Okay. When?

18 A. I think --

19 MS. SATAGAJ: Objection, form.

20 A. I would think before marriage.

21 Q. (By Mr. Freeman) Okay.

22 A. I mean, sorry, before the divorce.

23 Q. Okay. And why did you have access?

24 A. It's a family, so she had my access my  
25 accounts, and I had her access.



11:50:52 1 Q. Okay. And what account did you have access  
2 to?

3 A. I don't remember. I think Deepa2017 or  
4 something, yeah.

5 Q. Okay.

6 A. Yeah.

7 Q. When's the last time you accessed that email  
8 address?

9 A. Not -- once I get out of my house, that's it.  
10 So I'm done, so I never accessed. Like from -- after  
11 2017, I never accessed.

12 Q. Okay. So you've never accessed any of her  
13 emails since 2017?

14 A. Yes.

11:51:21 15 Q. But you did prior to that?

16 A. Yes.

17 Q. Okay.

18 A. And she accessed mine, and I accessed hers,  
19 so --

20 Q. Okay. How many bank accounts do you have?

21 MS. SATAGAJ: Objection, form.

22 A. I don't understand your question.

23 Q. (By Mr. Freeman) Well, please list for me  
24 each bank account that you have.

25 A. Where?

11:51:48 1 Q. Anywhere. Where?  
2 A. I have bank accounts here. I have one in  
3 Chase.  
4 Q. Okay.  
5 A. One in Well Fargo.  
6 Q. Okay.  
7 A. Yeah, and we have company accounts.  
8 Q. Okay.  
9 A. So I don't think the company's related here,  
10 so --  
11 Q. Okay. And do you have any accounts anywhere  
12 else?  
13 A. No.  
14 MS. SATAGAJ: Objection --  
11:52:07 15 A. That's it.  
16 MS. SATAGAJ: -- form.  
17 Q. (By Mr. Freeman) You don't have any accounts  
18 in India?  
19 A. Yes. I don't have any accounts in India.  
20 Q. Did you ever?  
21 A. I had before.  
22 Q. Okay. When did you?  
23 A. 2016, 2017 time.  
24 Q. Okay. And who were that with?  
25 A. ICIC Bank.

11:52:25 1 Q. And that's it?

2 A. Yes.

3 Q. No accounts with any other institution?

4 A. Yes. Bangra Bank I think I had, but, you  
5 know, it's -- it's very minor, and I never had access  
6 to that account, so --

7 Q. Who had access to it?

8 A. I -- I mean, I lost access, so -- that  
9 account might be still there, but I -- it's -- I don't  
10 use it at all.

11 Q. Okay. Who had access to it?

12 A. I mean, I had -- I had access, and I lost  
13 access.

14 Q. Okay.

11:52:47 15 A. Yeah.

16 Q. How much money was in there?

17 A. I don't know. Maybe -- I don't even know.  
18 Maybe like 200 bucks or something --

19 Q. Okay.

20 A. -- might be there.

21 Q. A small amount of money?

22 A. Yeah.

23 Q. Okay. There were just -- so other than that,  
24 there's just two accounts at ICIC Bank?

25 A. Yes.

11:53:04 1 Q. Okay. Why did you have those bank accounts?

2 A. Why did I have those bank accounts?

3 Q. Yes, sir.

4 A. So, I mean, you know, why does -- why does  
5 somebody have a bank account?

6 Q. When did you open those accounts?

7 A. I don't remember.

8 Q. Okay. Was it around 2016?

9 A. No. I think before.

10 Q. Okay. Were they opened in relation to the  
11 purchase of property?

12 A. No.

13 Q. Okay. Were they just open just to have a  
14 bank account?

11:53:32 15 A. Yes.

16 Q. Okay. Why did you close them then?

17 A. I had no need after.

18 Q. Okay. After what?

19 A. Just -- I mean, I -- there was -- I did not  
20 have a need for those accounts, so I closed it.

21 Q. Okay. And why did you no longer have a need  
22 for those accounts?

23 A. I'm not in anything in India, so --

24 Q. Okay. So you have nothing in India?

25 A. Yes.

11:53:56 1 Q. Except for a partnership?

2 A. Yes, that's correct.

3 Q. That's it?

4 A. Yes. And one properties in Deepa's name.

5 She's supposed to give it to me, which is awarded to

6 me --

7 Q. Okay.

8 A. -- in the decree, so she still did not give

9 me that property.

10 Q. Okay. The ICIC accounts, when did you close

11 them?

12 A. I don't remember.

13 Q. Okay. Was that in 2016?

14 A. I don't know.

11:54:16 15 Q. 2017?

16 A. I don't know.

17 Q. Did you -- do you have any documentation of

18 closing those accounts?

19 A. I don't have it.

20 Q. No documentation?

21 A. That's correct.

22 Q. When's the last time that you accessed funds

23 from ICIC?

24 A. I don't remember.

25 Q. Okay. Was it before or after the divorce?

11:54:35 1 A. I don't remember.  
2 Q. Okay. So you don't know if you've accessed  
3 funds from ICIC after the divorce?  
4 A. That's correct, yes.  
5 Q. Okay.  
6 A. I have no -- no ICIC accounts, no, so --  
7 Q. Okay. And you don't have any documentation  
8 to demonstrate that you closed the ICIC account?  
9 A. That's correct.  
10 Q. Do you have your final -- final bank  
11 statements?  
12 A. I don't have it, but I think Deepa shared  
13 some statements.  
14 Q. Okay.  
11:55:02 15 A. So that's -- that's it.  
16 Q. Okay.  
17 A. And those --  
18 Q. Did you --  
19 A. Those -- and those funds were -- was a  
20 deal -- part of the mediated settlement agreement.  
21 Q. Okay. I appreciate that.  
22 A. Thank you.  
23 Q. Did you have any documents related to that  
24 account?  
25 A. I don't have it, yeah.

11:55:20 1 Q. And you don't keep any --

2 A. No.

3 Q. -- bank records?

4 A. No. It's closed, so I -- I had no need for  
5 that, yeah.

6 Q. Okay. Did you -- did you ever have copies of  
7 bank statements from those accounts?

8 A. I don't have it --

9 Q. No?

10 A. -- no.

11 Q. And you've never accessed it online?

12 A. No.

13 Q. So you've never looked at your statements  
14 online?

11:55:40 15 A. Yes.

16 Q. How did you use that account?

17 A. I mean, it's long time back, so I'm not using  
18 anymore, so --

19 Q. Okay.

20 A. I don't -- it's not open.

21 Q. When you used it, how did you use it?

22 MS. SATAGAJ: Objection, form.

23 A. It's long time back, so I don't remember.

24 Q. (By Mr. Freeman) Like back in 2016, '17?

25 A. Yeah. '15, '16, yeah.

11:55:58 1 Q. And you don't know if you just went to the  
2 bank in person?

3 A. Yeah, I don't remember.

4 Q. Or if you used it online?

5 A. No, I don't --

6 MS. SATAGAJ: Objection --

7 A. -- remember.

8 MS. SATAGAJ: -- form.

9 Q. (By Mr. Freeman) Okay. Well, is there a  
10 reason you can't remember that?

11 A. There's no reason, so I -- I mean --

12 Q. Okay.

13 A. Yeah.

14 Q. No -- nothing that prohibits you from being  
11:56:17 15 able to remember it?

16 A. No.

17 Q. No physical problems?

18 A. No. I don't have any physical problems.

19 Q. No mental problems?

20 A. No.

21 Q. Nothing traumatic that's occurred since then  
22 that -- that has inhibited your memory?

23 A. No.

24 Q. Okay. You -- you're -- you've owned some  
25 property in India then; is that correct?



11:56:40 1 A. When?  
2 Q. Have you in the past --  
3 A. I had.  
4 Q. -- at any time?  
5 A. I had.  
6 Q. Okay. How many properties have you owned?  
7 MS. SATAGAJ: Objection, form.  
8 Can you clarify the time period?  
9 Q. (By Mr. Freeman) Let's call this from 2010  
10 forward.  
11 MS. SATAGAJ: Objection, form.  
12 Q. (By Mr. Freeman) How many properties have you  
13 owned?  
14 A. I think the properties she listed.  
11:57:03 15 Q. Only those properties?  
16 A. Under -- under her name. One property on her  
17 name.  
18 Q. Okay. Do you own --  
19 A. Deepa's name.  
20 Q. Have you owned any others?  
21 A. She owns that property.  
22 Q. Okay. Have you owned any other properties?  
23 A. No.  
24 Q. Are you a pretty good investor in real  
25 estate?

11:57:20 1 A. Yes. Kind of, yeah.

2 Q. Okay. Just pretty sophisticated about it or  
3 not?

4 A. No, yes. I mean, you can see my decree. She  
5 got a bunch of houses here, all doubled up, tripled  
6 up, so --

7 Q. All right. You know a pretty good deal?

8 A. She got a pretty good deal actually.

9 Q. Really?

10 A. Yeah.

11 Q. And is this a slight against your lawyers?

12 A. What is that?

13 Q. Do you think she got a fair deal or not a  
14 fair deal?

11:57:42 15 A. Well, she got a super deal.

16 Q. All right.

17 A. Yes.

18 Q. Are you very generous with her?

19 A. Yes.

20 Q. Okay. Should she be grateful?

21 A. She took like two years -- two years' worth  
22 of salary in advance.

23 Q. Okay.

24 A. \$200,000, she took extra for two years.

25 Q. You think she owes you some money?

11:58:02 1 A. I think it's all settled -- everything is

2 settled in the mediation settlement agreement, so --

3 Q. Okay. Should she be grateful to you for what

4 you gave her?

5 A. I don't know whether she grateful or not.

6 Maybe you should ask her.

7 Q. Okay. You're a pretty sophisticated real

8 estate investor?

9 A. What do you mean sophisticated?

10 Q. Well, I mean --

11 A. I don't understand.

12 Q. -- do you feel like you know what you're

13 doing, or are you just throwing money at real estate?

14 A. I don't have that much money to throw any

11:58:24 15 away anymore, so --

16 Q. Okay. Did you do any analysis on the

17 properties, or did you just buy properties?

18 A. Just buy properties. I mean, look -- I

19 definitely look at it online, so --

20 Q. Okay. That's it?

21 A. Yeah.

22 Q. Okay. So why do you say you're a good

23 investor in real estate?

24 A. I did not say I'm a good investor. I mean,

25 I -- I know -- I think some luck came, so --

11:58:47 1 Q. Okay. You bought some --

2 A. Yeah, I mean, I'm not --

3 Q. You've invested in some properties in India?

4 A. Yes.

5 Q. And are you familiar with India property  
6 records?

7 A. Yes.

8 Q. Okay.

9 A. To an extent, yes.

10 Q. Okay. And you're familiar with Indian  
11 property contracts generally?

12 A. Yes.

13 Q. Okay. You filed this divorce against -- you  
14 filed the divorce that -- that has led to this case  
11:59:10 15 back on February 7th, 2017; is that --

16 A. Yes.

17 Q. -- correct?

18 And it ended with a divorce decree being  
19 entered on August 1st, 2017; is that correct?

20 A. Yes.

21 Q. Okay. If you will, look at Exhibit 1 in  
22 your notebook, sir.

23 A. Yes.

24 Q. Okay. Do you see that document?

25 A. Yes.

11:59:35 1 Q. And do you recognize it?

2 A. I mean, I saw it, so --

3 Q. What -- what do you mean you saw it?

4 A. I mean, that time they gave this -- you know,  
5 they shared this exhibit, I think, yeah, Family  
6 District Court General Orders.

7 Q. Who shared this exhibit?

8 A. I don't remember, but I did see this one  
9 before, so --

10 Q. Okay. Is this -- do you understand this to  
11 be a Standing Order for the Dallas County Family  
12 District Court?

13 A. Uh-huh.

14 Q. Okay. And if you'll look at the last page  
12:00:07 15 there.

16 A. Page 4?

17 Q. Yes, sir.

18 Does the order indicate it's effective as  
19 of January 1st, 2017?

20 A. Uh-huh.

21 Q. Is that correct?

22 A. Yes. Is it --

23 Q. Does it appear to be signed by a bunch of  
24 Dallas judges?

25 A. Yes.

12:00:24 1 Q. Okay. If you'll look at Section 4 on Page 2  
2 of the order.

3 A. Section 2. Section 2?

4 Q. Yes, sir.

5 Were you --

6 A. Yeah.

7 Q. Were you familiar with this order at the time  
8 of your -- the -- the time you initiated the divorce  
9 proceedings?

10 A. Can you please repeat?

11 Q. Were you aware of this order in February of  
12 2017?

13 A. Yes. My attorney told.

14 Q. Okay. Which attorney told you about it?

12:00:49 15 MS. SATAGAJ: Objection, invades  
16 attorney-client privilege.

17 A. Ms. Satagaj.

18 Q. Okay. Mr. Chintam -- and he -- if you'll  
19 look at Section 4 on Page 2, is the title of Section 4  
20 "Preservation of Property and Use of Funds During  
21 Divorce Case"?

22 A. Uh-huh.

23 Q. And does it state, "If this is a divorce  
24 decree, both parties to the marriage are ordered to  
25 refrain from intentionally and knowingly doing the

12:01:28 1 following acts"? Am I reading that correctly?

2 A. Okay. Uh-huh.

3 Q. Is that yes or no?

4 A. Which line you are reading?

5 Q. Right under Section 4.

6 A. Under Section 4, which one? Oh, okay. "This  
7 Divorce case both parties to the marriage" -- okay.  
8 Yeah.

9 Q. Okay. And Section 4.1 states, "Destroying,  
10 removing, concealing, encumbering, transferring, or  
11 otherwise harming or reducing the value of the  
12 property of one or both of the parties," is that  
13 correct?

14 A. Yes.

12:01:59 15 Q. Okay. Does Section 4.2 say, "Falsifying a  
16 writing or record, including an electronic record,  
17 relating to the property of either party"?

18 A. Okay.

19 Q. Okay. And does Section 4.6 state, "Selling,  
20 transferring, assigning, mortgaging, encumbering, or  
21 in any other manner alienating any of the property of  
22 either party, whether personal property or real  
23 property or intellectual properties, and whether  
24 separate or community, except as specifically  
25 authorized by this order"?

12:02:28 1 A. Yes.

2 Q. Okay. And based on the dates and the  
3 signatures, would you agree that this standing order  
4 was in effect with when you filed the divorce in  
5 February of 2017?

6 A. No.

7 MS. SATAGAJ: Objection, form.

8 Q. (By Mr. Freeman) Why not?

9 A. Because this -- this happened in 2016.

10 Q. But I'm asking whether this order was in  
11 effect when you filed the divorce case?

12 A. Yeah.

13 Q. So that's yes?

14 A. Yes. This --

12:02:57 15 Q. You would --

16 A. The order is in effect when I -- when I filed  
17 the divorce, yes.

18 Q. Correct.

19 Okay. And you were aware of it when you  
20 filed the divorce case --

21 A. Yes.

22 Q. -- correct?

23 A. Yes.

24 Q. Okay. Have you had your deposition taken  
25 before, sir?



12:03:09 1 A. No.  
2 Please repeat the question.  
3 Q. Have you had your deposition taken before?  
4 A. Can you tell the time frame? "Before" means  
5 when?  
6 Q. Well, how many times have you had your  
7 deposition taken?  
8 A. Two times.  
9 Q. Okay. So is the answer just yes?  
10 A. No, you are -- I don't understand your  
11 question.  
12 Q. Okay. The question was: Have you ever had  
13 your deposition taken?  
14 A. Yes.  
12:03:38 15 Q. Okay. And when was that?  
16 A. I don't remember. 2017, '18. I don't know.  
17 Q. August of 2018 sound right?  
18 A. Maybe, yeah.  
19 Q. Okay. And were you asked questions about  
20 properties in India in that deposition?  
21 A. I don't remember.  
22 Q. Okay. Would you have given truthful answers  
23 to those questions if you did?  
24 A. I --  
25 MS. SATAGAJ: Objection, form.

12:04:02 1 A. I always give truthful answers.

2 Q. (By Mr. Freeman) You always give truthful  
3 answers?

4 A. Yes.

5 Q. In 2018, did you own any property in India?

6 A. No.

7 Q. You didn't own any property in --

8 A. No.

9 Q. -- India?

10 A. Except the -- the ones that were awarded in  
11 the divorce decree.

12 Q. Okay. So is that a, yes, you did own  
13 property in India in 2018?

14 A. Yeah. The property with the fish and chicken  
12:04:24 15 business which awarded to me.

16 Q. Okay.

17 A. Yes.

18 Q. So if you had answered then that "right now I  
19 don't own anything," would that be a correct answer or  
20 an incorrect answer?

21 A. No.

22 MS. SATAGAJ: Objection, form.

23 A. I -- I have the property which is awarded to  
24 me.

25 Q. (By Mr. Freeman) Okay. So it -- it would be

12:04:42 1 incorrect in 2018 to say that you had -- you didn't  
2 own any India property?

3 MS. SATAGAJ: Objection, form.

4 A. Yes.

5 Q. (By Mr. Freeman) Because you did own property  
6 in India in 2018?

7 A. Yeah. The -- the property which is awarded  
8 in the divorce decree.

9 Q. Okay.

10 A. Yeah.

11 Q. Sir, if you will, look to Exhibit 2.

12 A. Okay.

13 Q. Have you seen this document before, sir?

14 A. Yes.

12:05:07 15 Q. Was this produced to you by Ms. Adema?

16 A. I -- I -- I mean, I don't -- I didn't look at  
17 it closely.

18 Q. Okay. Was it produced by her maybe about  
19 year ago?

20 A. Okay.

21 Q. Did you review the documents that were  
22 produced?

23 A. No.

24 Q. No?

25 Have you had --

12:05:28 1 A. I -- I might have glanced it, but yeah.

2 Q. Okay. Have you had some -- a reasonable  
3 amount of time to do so if you wanted?

4 A. Yeah.

5 Q. Okay. Do you know what this document is?

6 A. Yeah. This is Encumbrance Certificate.

7 Q. Okay. So this is the Encumbrance  
8 Certificate?

9 A. Yeah. The government official document shows  
10 who is the current owner.

11 Q. Okay. And what is the date of this document?

12 A. It says 28-02-2019.

13 Q. Okay. And what property is this document  
14 related to?

12:06:04 15 A. Krishnayapalem.

16 Q. Okay. Is this -- is that the Krishnayapalem  
17 property --

18 A. Yes, looks like.

19 Q. -- that's at issue in this case, right?

20 A. Yes.

21 Q. Do you currently own this property?

22 A. No.

23 Q. Okay. If you'll look at Page 5, sir, of that  
24 exhibit.

25 A. Page 5? 1, 2, 3, 4 -- oh.

12:06:31 1 Q. I think it should be --  
2 A. 307 or --  
3 Q. Yes, sir.  
4 A. Okay.  
5 Q. Does your name appear there in the bottom  
6 boxes?  
7 A. Bottom block? Yes.  
8 Q. Okay. And what is -- what is reflected  
9 there? What is that transaction?  
10 A. This is buying Krishnayapalem --  
11 Q. Okay.  
12 A. -- property.  
13 Q. So does this reflect you buying  
14 Krishnayapalem in -- around August 12th, 2005?  
12:06:58 15 A. 2015, yes.  
16 Q. Excuse me, 2015?  
17 A. Yes.  
18 Q. Okay. And is that -- is that correct?  
19 A. Yes.  
20 Q. Okay. And does this document, looking at it,  
21 does it appear to be a true and correct copy of the  
22 property records at issue?  
23 A. Yes.  
24 Q. Okay. What is -- there -- there is a  
25 referenced development agreement.

12:07:26 1 A. Uh-huh.

2 Q. What is that?

3 A. The government took the land from us and, you  
4 know, developed that land and give like a house  
5 site --

6 Q. Okay.

7 A. -- back.

8 Q. What do you mean -- they gave you what?

9 A. Like they take the land and acreage and  
10 convert that into house site, and they give, you know,  
11 partial house site.

12 Q. Okay. They gave you partial house site.  
13 Where is that?

14 A. It's in Krishnayapalem.

12:07:55 15 Q. Okay. And do you still own that?

16 A. I don't own it. I sold it --

17 Q. Oh, okay.

18 A. -- way back in 2016, and I am not the -- I am  
19 not the current owner --

20 Q. Okay.

21 A. -- as well.

22 Q. Was there an agreement for a commercial  
23 development related to this property?

24 A. I think so.

25 Q. Okay. Is that --

12:08:09 1 A. That's what --

2 Q. -- Exhibit 3?

3 A. -- development -- Exhibit 3?

4 Q. Yes, sir.

5 A. Oh, yes.

6 Q. Okay. And -- and what is that document,

7 Exhibit 3?

8 A. It is a development agreement.

9 Q. Okay. And when did you execute that  
10 development agreement?

11 A. This was executed, it looks like, on January  
12 2018.

13 Q. So January 9th, 2018?

14 A. Yes.

12:08:38 15 Q. And why did you develop -- why did you  
16 execute that in January of 2018?

17 A. Because it's -- you know, because, you know,  
18 the -- the property was already sold to Mydam Rajanna,  
19 but in order -- in order for us to complete this  
20 one --

21 Q. Uh-huh.

22 A. -- so the government has asked us to do this  
23 before I transfer the house sites to Mydam Rajanna.

24 Q. Okay.

25 A. Yeah.

12:09:03 1 Q. So as of this time, you hadn't actually  
2 transferred the -- the ownership --

3 A. Correct.

4 Q. -- on the Krishnayapalem property?

5 A. Correct.

6 Q. Okay. And so you enter into a development  
7 agreement on January 9th, 2018. Is that with the  
8 India government?

9 A. Yes.

10 Q. Okay. And what was that agreement? What was  
11 the purpose of that agreement?

12 A. It -- based -- I just told you, right? They  
13 will give you the house sites.

14 Q. Okay.

12:09:29 15 A. Yeah.

16 Q. That wasn't an -- was it an agreement for  
17 them to develop the property?

18 A. Yes.

19 Q. Okay. And you gave up all ownership in that  
20 property at that point?

21 A. Yes.

22 Q. Did you deed the property over to them?

23 A. No. It's not -- it's -- you don't give  
24 that -- everything. It's -- it's a kind of a -- you  
25 know, they take that, and you -- they give you back



12:09:49 1 some house -- good land back -- good land.  
2 Q. They give you good land?  
3 A. Yeah.  
4 Q. Was it valuable land?  
5 A. Oh, yeah.  
6 Q. How much was it worth?  
7 A. I -- I don't remember. It should be there.  
8 Q. Okay.  
9 A. Yeah.  
10 Q. There in the development agreement?  
11 A. I don't know.  
12 Q. Wh- -- where would the value of that land be  
13 reflected?  
14 A. Should be here in the market value.  
12:10:11 15 Q. Okay.  
16 A. It's -- it's there.  
17 Q. Are you talking about the property records?  
18 A. Yeah.  
19 Q. Well, let's stay on Exhibit 3 right now --  
20 A. Okay.  
21 Q. -- so we -- we're all talking about the same  
22 thing.  
23 A. Yes.  
24 Q. Was -- this development agreement, that  
25 wasn't a -- that wasn't a document for a sale of

12:10:28 1 property, was it?

2 A. That's correct.

3 Q. It -- it was not?

4 A. It's not.

5 Q. Okay. It's just a contract?

6 A. It's an understanding contract so that, you  
7 know, they -- in exchange, they give the house  
8 sites --

9 Q. Okay.

10 A. -- which -- which the final house sites were,  
11 you know, close to Mydam Rajanna.

12 Q. Got it.

13 A. Yeah.

14 Q. And you executed that document --

12:10:49 15 A. Yes.

16 Q. -- correct, in your name --

17 A. Yes.

18 Q. -- with respect to the Krishnayapalem  
19 property?

20 A. Yes.

21 Q. Okay. Going back to Exhibit 2, sir.

22 A. Okay.

23 Q. Does your name also appear on Page -- Page 3  
24 of that exhibit?

25 A. Page 3?

12:11:14 1 MS. SATAGAJ: Jason, I think you mean  
2 Page 4.  
3 MR. FREEMAN: Page --  
4 MS. SATAGAJ: Is it ADEMA 306?  
5 MR. FREEMAN: I think I do mean Page 4.  
6 A. Yeah, I see that. Yeah.  
7 Q. (By Mr. Freeman) Okay. What is -- what is  
8 that designating?  
9 A. It's a Development Agreement --  
10 Q. Okay.  
11 A. -- Cum GPA.  
12 Q. Okay. Is that the development agreement we  
13 just --  
14 A. Yes.  
12:11:35 15 Q. -- discussed?  
16 A. Yes.  
17 Q. Okay. Did your name appear anywhere else  
18 between where we saw it --  
19 A. Uh-huh.  
20 Q. -- on Page --  
21 A. Uh-huh.  
22 Q. -- Page 5 and where we just saw it on Page 4?  
23 A. I see it one time here.  
24 Q. Just that?  
25 A. No, I see one more time on 307.

12:11:58 1 Q. Okay. Where was that?  
2 A. 307. ADEMA 307.  
3 Q. Yes, sir.  
4 A. Yeah.  
5 Q. So we see it there.  
6 A. Yeah.  
7 Q. That's you -- that's you acquiring it --  
8 A. Yes.  
9 Q. -- correct?  
10 A. Yes.  
11 Q. Okay. And then going up, do these following  
12 items on these properties records reflect later or  
13 subsequent transactions --  
14 A. Uh-huh.  
12:12:19 15 Q. -- related to the property?  
16 A. Yes.  
17 Q. Okay. And where does your name next appear?  
18 A. In 307 exhibit.  
19 Q. Okay. And then going up, where does it  
20 appear next? Is it on 306? Is it a li- -- that line  
21 Item --  
22 A. Yeah.  
23 Q. -- 11 of 43?  
24 A. Yes.  
25 Q. Okay. And going up, where does it appear

12:12:44 1 after that?

2 A. That's it, I think.

3 Q. That's it?

4 A. Yeah.

5 Q. Okay. Now, if you go to the first page of  
6 that document --

7 A. Uh-huh.

8 Q. -- you agree this -- this is a record from  
9 March 25th, 2019?

10 A. Yes.

11 Q. Okay. And when did you transfer ownership  
12 into -- into the name of the purchaser of  
13 Krishnayapalem?

14 THE WITNESS: Yeah. Could you please  
12:13:19 15 provide that latest Encumbrance Certificate I gave for  
16 this one, Krishnayapalem? It would be -- it would  
17 make it easier, Jennifer. Can we maybe get all the  
18 Encumbrance Certificates, like take a, you know, few  
19 minutes break maybe so that we can easily --

20 MS. SATAGAJ: Yeah.

21 THE WITNESS: Yeah, I think that helps.

22 MR. FREEMAN: We'll -- we'll go off the  
23 record for --

24 THE WITNESS: Yeah.

25 MR. FREEMAN: A second.

12:13:39 1 THE WITNESS: Okay. I think that will  
2 make more easier.

3 MR. FREEMAN: Okay.

4 THE VIDEOGRAPHER: We're off the record  
5 at 12:12 p.m.

6 (Break from 12:12 p.m. to 2:01 p.m.)

7 THE VIDEOGRAPHER: We're back on the  
8 records at 2:01 p.m.

9 Q. (By Mr. Freeman) Mr. Chintam, before we took  
10 a lunch break, we were discussing the Krishnayapalem  
11 property. I asked you: Had you sold and  
12 transferred -- transferred this property as of March  
13 of 2019?

14 A. No. The -- the contract was in the -- it  
14:03:27 15 was -- the contract was in 2016, but finally, you  
16 know, due to (indiscernible) states, it has been  
17 executed on 2018 -- 08-2018. That means August 2018.

18 Q. Okay. And you maintain that is when you  
19 transferred title?

20 A. Yes. That's when the title was transferred.

21 Q. And who was it transferred to?

22 A. Mydam Rajanna.

23 Q. Mydam Rajanna?

24 What was this property used for while you  
25 held it?

14:04:00 1 MS. SATAGAJ: Objection, form.  
2 A. It's just a piece of land, so --  
3 Q. (By Mr. Freeman) Did you rent it?  
4 A. No.  
5 Q. Did you -- and you didn't lease it --  
6 A. No.  
7 Q. -- correct?  
8 Okay. Did you invest any additional  
9 funds in it?  
10 A. No.  
11 Q. Did you obtain any permits?  
12 A. No.  
13 Q. What was near it?  
14 MS. SATAGAJ: Objection, form.  
14:04:32 15 Q. (By Mr. Freeman) What was adjacent to this  
16 property?  
17 A. What --  
18 MS. SATAGAJ: Objection, form.  
19 A. What is it?  
20 Q. (By Mr. Freeman) Was there anything in close  
21 proximity, close to this property?  
22 MS. SATAGAJ: Objection, form.  
23 A. No.  
24 Q. (By Mr. Freeman) Nothing? Just --  
25 A. Yeah, just a piece of land.

14:04:48 1 Q. Just more land around it?

2 A. Yes.

3 Q. No buildings?

4 A. No.

5 Q. No developments around it?

6 MS. SATAGAJ: Objection, form.

7 A. It's been like -- after -- after that, I  
8 don't know now what is it -- what it is, but yes, at  
9 that time nothing was there.

10 Q. (By Mr. Freeman) When -- okay.

11 A. Yeah. Because, you know -- you know,  
12 technically, I sold this property 2016, so I had no  
13 interest on that after that.

14 Q. Okay.

14:05:09 15 A. It's just formalities to time.

16 Q. Okay. Who managed this property while you  
17 held it?

18 MS. SATAGAJ: Objection, form.

19 A. There's nobody.

20 Q. (By Mr. Freeman) Nobody?

21 Did anyone look after it?

22 A. No.

23 Q. Did you ever pay taxes on it?

24 A. No. There's no taxes.

25 MS. SATAGAJ: Objection.



14:05:27 1 Q. (By Mr. Freeman) Did it generate any revenue?

2 A. No.

3 MS. SATAGAJ: Objection, form.

4 Q. (By Mr. Freeman) Okay. Do you have any other  
5 records with respect to this property?

6 A. (Indicating.)

7 Q. And can you tell us what -- what it is that  
8 you're looking at and holding?

9 A. It's Exhibit No. 30.

10 Q. Okay.

11 A. That's -- it's Encumbrance -- Statement of  
12 Encumbrance on Property, which says description of the  
13 property, Krishnayapalem.

14 Q. Okay.

14:05:58 15 A. And registration execution date, August  
16 2018 -- August 28, 2018.

17 Q. Okay.

18 A. And it is sold to Mydam Rajanna.

19 Q. Okay. Did -- when did you produce this  
20 document, this Exhibit 30, to my client?

21 A. To your client?

22 Q. Yes.

23 A. I never produced this directly to your  
24 client. I don't interact with your client.

25 Q. Was it just produced this week of this

14:06:29 1 deposition?

2 A. No. I -- I gave it to my attorney.

3 Q. Okay. And -- and I guess I'm asking: Did  
4 your attorneys just -- just produce this document to  
5 me --

6 MS. SATAGAJ: Objec- --

7 Q. (By Mr. Freeman) -- this week of deposition?

8 MS. SATAGAJ: Objection, form.

9 A. No.

10 Q. (By Mr. Freeman) And why do you say no?

11 A. Because I --

12 MS. SATAGAJ: Objection, form.

13 A. -- I produced before.

14 Q. (By Mr. Freeman) When did you produce this  
14:06:50 15 document?

16 A. I don't remember.

17 MS. SATAGAJ: Objection, form. It  
18 invades the attorney-client privilege.

19 Q. (By Mr. Freeman) Would you be surprised to  
20 learn that I just within the last few days received  
21 this document?

22 MS. SATAGAJ: Objection, form.

23 A. No.

24 Q. (By Mr. Freeman) Why would you not be  
25 surprised to learn that?

14:07:05 1

MS. SATAGAJ: Objection, form.

2 A. We already produced, and your client has all  
3 the information.

4 Q. (By Mr. Freeman) Did you ask anyone to not  
5 produce this document to me?

6 MS. SATAGAJ: Objection --

7 A. No.

8 MS. SATAGAJ: -- form.

9 A. Why would I say that?

10 Q. (By Mr. Freeman) Okay. And the Bates label  
11 number on Exhibit 30, does it begin with OWLS000449?

12 A. Yes.

13 Q. Okay. And there are three documents attached  
14 to that -- or two additional documents?

14:07:38 15

A. Yes.

16 Q. Okay. Okay. I want to come back to that  
17 document in just a second.

18 A. Okay.

19 Q. I want to ask you with respect to the  
20 Krishnayapalem property, how did you purchase it?

21 MS. SATAGAJ: Objection, form.

22 A. How did I purchase?

23 Q. (By Mr. Freeman) Yes, sir.

24 A. I -- I was there. I went there and purchased  
25 it.

14:07:59 1 Q. Okay. When -- where?  
2 MS. SATAGAJ: Objection, form.  
3 A. In Krishnayapalem.  
4 Q. Okay. So when did you go to  
5 Krishnayapalem --  
6 MS. SATAGAJ: Objection, form.  
7 Q. (By Mr. Freeman) -- to purchase it?  
8 A. I don't remember.  
9 Q. Okay. What did you do to purchase it?  
10 MS. SATAGAJ: Objection, form.  
11 A. What did I do? What do you mean?  
12 Q. (By Mr. Freeman) Correct.  
13 A. I don't understand your question.  
14 Q. Were there documents exchanged?  
14:08:24 15 MS. SATAGAJ: Objection, form.  
16 A. Document exchanged?  
17 Q. (By Mr. Freeman) Yes, sir.  
18 A. No. This is the documents.  
19 Q. Did you execute anything to in order to  
20 purchase it?  
21 MS. SATAGAJ: Objection, form.  
22 A. For every property we buy, we have to do the  
23 process. Same process that we did for Mydam Rajanna,  
24 it was the same thing.  
25 Q. Okay.

14:08:45 1 A. Yeah.

2 Q. Was there -- was there a purchase contract  
3 then?

4 MS. SATAGAJ: Objection, form.

5 A. I -- I don't remember. I don't have it.

6 Q. (By Mr. Freeman) Okay.

7 A. It's been a long time. It's like -- you're  
8 talking about six years back.

9 Q. Right.

10 A. Yeah.

11 Q. So you don't know if there was a contract to  
12 purchase it?

13 MS. SATAGAJ: Objection, form.

14 A. (No verbal response.)

14:09:02 15 Q. (By Mr. Freeman) Okay. How did you pay for  
16 it?

17 MS. SATAGAJ: Objection, form.

18 A. How -- how did I pay for it?

19 Q. (By Mr. Freeman) Correct.

20 A. It's -- yeah, I paid like cash.

21 Q. You paid cash?

22 How much cash did you pay for it?

23 A. I don't --

24 MS. SATAGAJ: Objection, form.

25 A. -- remember.

14:09:23 1 Q. (By Mr. Freeman) You don't remember?  
2 A. It's been a long time, yeah.  
3 Q. Okay. Do you have any idea how much you paid  
4 for it?  
5 A. No.  
6 MS. SATAGAJ: Objection, form.  
7 Q. (By Mr. Freeman) None?  
8 MS. SATAGAJ: Objection, form.  
9 A. No.  
10 Q. (By Mr. Freeman) Where did you get the cash  
11 that you used to pay for it?  
12 MS. SATAGAJ: Objection, form.  
13 A. It's -- yeah, I -- it's irrelevant, so -- I  
14 don't remember how -- how I got that. It's been a  
14:09:51 15 long time, so --  
16 Q. (By Mr. Freeman) Okay.  
17 A. Yeah.  
18 Q. Which is it, sir? Is it irrelevant?  
19 A. I don't remember.  
20 Q. Okay. So you don't remember -- you don't  
21 remember where you got the funds to purchase this --  
22 A. Yes.  
23 Q. -- property?  
24 MS. SATAGAJ: Objection, form.  
25 Q. (By Mr. Freeman) And you were physically --

14:10:06 1 THE WITNESS: Can I -- can I get a  
2 clarification? So, Jennifer, when you say "objection,  
3 form," so if I don't know, should I just say I don't  
4 know, or should I just keep quiet?

5 MR. FREEMAN: I don't care if you tell  
6 him.

7 MS. SATAGAJ: If you don't know the  
8 answer to the question --

9 THE WITNESS: Okay.

10 MS. SATAGAJ: -- then you don't know the  
11 answer to the question.

12 THE WITNESS: Okay.

13 MS. SATAGAJ: If you know the answer to  
14 the question, then pursuant to the Judge's  
14:10:30 15 instructions earlier today, you should answer --

16 THE WITNESS: Okay.

17 MS. SATAGAJ: -- the question.

18 THE WITNESS: Thank you.

19 MS. SATAGAJ: And if you don't understand  
20 the question --

21 THE WITNESS: Yes.

22 MS. SATAGAJ: -- please tell Mr. Freeman.

23 THE WITNESS: I will ask, yeah.

24 MS. SATAGAJ: -- as you are aware.

25 Q. (By Mr. Freeman) Were you -- were you

14:10:46 1 physically there for the purchase?

2 MS. SATAGAJ: Objection, form.

3 A. I -- I don't remember. It's been six years,  
4 yeah.

5 Q. (By Mr. Freeman) Okay. Do you remember if  
6 anyone was with you?

7 A. No --

8 MS. SATAGAJ: Objection, form.

9 A. -- I don't remember.

10 Q. (By Mr. Freeman) Do you remember if you asked  
11 anyone to assist you with this purchase?

12 MS. SATAGAJ: Objection, form.

13 A. I don't remember.

14 Q. (By Mr. Freeman) Do you remember if you had  
14:11:05 15 any involvement in drafting any of the documents?

16 MS. SATAGAJ: Objection, form.

17 A. I don't remember.

18 Q. (By Mr. Freeman) Okay. Do you still own this  
19 property?

20 A. No. Please look at these documents. It's  
21 Mydam Rajanna owns that.

22 Q. Okay.

23 A. Okay.

24 Q. Now, who did you sell this property to?

25 A. Mydam Rajanna.



14:11:31 1 Q. Mydam Rajanna?

2 Have you had any discussions with Mydam  
3 Rajanna since you sold this property to him?

4 A. No.

5 MS. SATAGAJ: Objection, form.

6 Q. (By Mr. Freeman) You haven't?

7 Have you had any email correspondence  
8 with Mydam Rajanna?

9 MS. SATAGAJ: Objection --

10 A. No.

11 MS. SATAGAJ: -- form.

12 Q. (By Mr. Freeman) Have you had any text  
13 conversations with Mydam Rajanna?

14 MS. SATAGAJ: Objection --

14:11:50 15 A. No.

16 MS. SATAGAJ: -- form.

17 Q. (By Mr. Freeman) Have you in any way  
18 communi- -- communicated with Mydam Rajanna?

19 MS. SATAGAJ: Objection --

20 A. No.

21 MS. SATAGAJ: -- form.

22 Q. (By Mr. Freeman) Okay. And -- and you're  
23 certain of that?

24 A. Yes.

25 Q. Is there any reason you would be uncertain?

14:12:05 1 MS. SATAGAJ: Objection, form.  
2 A. No, I'm -- I'm certain.  
3 Q. (By Mr. Freeman) Okay. Have -- you -- you  
4 sold -- who did you sell it to?  
5 A. Mydam Rajanna.  
6 Q. Okay. Do you know multiple Mydam Rajannas?  
7 A. My- -- no, I know only Mydam Rajanna.  
8 Q. Only one?  
9 A. Yes.  
10 Q. Okay. How did you get document -- the  
11 document that's reflected as Exhibit 30?  
12 MS. SATAGAJ: Objection, form.  
13 A. This you can search online.  
14 Q. (By Mr. Freeman) So you obtained it online?  
14:12:36 15 A. Yes.  
16 Q. Can you tell me what web address you used?  
17 A. I don't remember. If you Google it, you'll  
18 find it.  
19 Q. When did you find this online?  
20 A. It's -- like, November 2020.  
21 Q. November 2020?  
22 A. Yes.  
23 Q. But you requested this online?  
24 A. Yes. Online anybody can search. Even you  
25 can search. You'll find it --

14:12:57 1 Q. Okay.  
2 A. -- right now.  
3 Q. Was it from an Indian government website?  
4 A. Yes. From Registration and Stamps.  
5 Q. Okay.  
6 A. Uh-huh.  
7 Q. So even somebody as dumb as me could find it?  
8 A. Yes.  
9 Q. Okay. But you didn't ask anybody in India  
10 for help obtaining it?  
11 A. No.  
12 MS. SATAGAJ: Objection --  
13 A. This -- you can --  
14 MS. SATAGAJ: -- form.  
14:13:17 15 A. -- find it online.  
16 Q. (By Mr. Freeman) Okay. And did -- did  
17 anyone -- did anyone assist you with that process?  
18 MS. SATAGAJ: Objection --  
19 A. No.  
20 MS. SATAGAJ: -- form.  
21 Q. (By Mr. Freeman) Okay. Mr. Chintam, on  
22 Exhibit 30, I'd like for you to look at, one, the  
23 date. Does it state that this is from November 17th,  
24 2020?  
25 MS. SATAGAJ: Objection, form.

14:13:39 1 A. On Exhibit 30? Yeah, November 17, 2020.

2 Yes.

3 Q. (By Mr. Freeman) Okay. And the line right  
4 below that, what does that say?

5 A. It says, Sri/Smt: M. Rajanna having searched  
6 for a statement giving particulars of registered acts  
7 and encumbrances, if any, in respect of the under  
8 mentioned property.

9 Q. Okay. And this property that's described  
10 there, is that the same Krishnayapalem property that  
11 we've been discussing?

12 A. Yes.

13 Q. Okay. Second, we -- we had talked about  
14 another property a bit earlier. That was the Pangra  
14:14:19 15 property?

16 A. Yes.

17 Q. And you sold that property to Boddu Sayanna?

18 A. Yes.

19 Q. Okay. Since you sold that property, have you  
20 had any communication with Boddu Sayanna?

21 A. No.

22 MS. SATAGAJ: Objection, form.

23 Q. (By Mr. Freeman) Have you had any email  
24 correspondence with Boddu Sayanna?

25 A. No.

14:14:39 1 MS. SATAGAJ: Objection, form.  
2 Q. (By Mr. Freeman) Have you had any text  
3 exchanges with Boddu Sayanna?  
4 MS. SATAGAJ: Objection, form.  
5 A. No.  
6 Q. (By Mr. Freeman) Okay. And you haven't  
7 spoken with Boddu Sayanna?  
8 MS. SATAGAJ: Objection --  
9 A. No.  
10 MS. SATAGAJ: -- form.  
11 Q. (By Mr. Freeman) Okay. And you're absolutely  
12 certain of that?  
13 A. Yes.  
14 MS. SATAGAJ: Objection, form.  
14:14:55 15 Q. (By Mr. Freeman) Is there any reason why you  
16 would be uncertain?  
17 A. No. I am certain.  
18 Q. Okay. Going back to Exhibit 30, why is M.  
19 Rajanna listed on the second line?  
20 MS. SATAGAJ: Objection, form.  
21 A. What did you say?  
22 Q. (By Mr. Freeman) Why is M. Rajanna listed on  
23 the second line?  
24 A. In Exhibit 31?  
25 Q. 30.

14:15:23 1 A. In exhibit 30, it is -- first, right, it  
2 says -- I am not sure what you are referring. Can you  
3 show me?

4 Q. Yes, sir. If you see where I'm --

5 A. Yeah.

6 Q. -- pointing to?

7 A. Uh-huh.

8 Q. Did Mr. Rajanna obtain this document?

9 A. This document?

10 MS. SATAGAJ: Objection, form.

11 A. No.

12 Q. (By Mr. Freeman) Yes, sir.

13 A. No.

14 Q. No?

14:15:43 15 Why is he listed there?

16 A. It -- I -- I guess it's automatically listed  
17 I think. I am not sure.

18 Q. Do you?

19 A. Yeah.

20 Q. You -- you don't actually know?

21 A. Yeah, I don't know.

22 Q. Okay. If you'll turn back to what's marked  
23 as Exhibit 2.

24 A. Exhibit 2?

25 Q. Yes, sir.

14:16:07 1 Now, is that also a Statement of  
2 Encumbrance on Property?  
3 A. Yes.  
4 Q. Okay. And is that dated March 25th, 2019?  
5 A. Yes.  
6 Q. And it's with respect to the Krishnayapalem  
7 property?  
8 A. Yes.  
9 Q. Okay. Why is the name on the second line  
10 there in Adema Sandeep Kumar?  
11 A. I don't know.  
12 Q. You don't know?  
13 A. I don't.  
14 Q. Do you think that's automatically added  
14:16:30 15 there?  
16 A. Yeah, I have no idea.  
17 Q. Was his name anywhere in the documents?  
18 MS. SATAGAJ: Objection, form.  
19 A. I don't know.  
20 Q. (By Mr. Freeman) Okay.  
21 A. Yeah.  
22 Q. Do you, in fact, know that that's not  
23 automatically generated?  
24 MS. SATAGAJ: Objection, form.  
25 A. I have no idea.

14:16:46 1 Q. (By Mr. Freeman) Does that actually state  
2 the -- the name of the individual who requested these  
3 records?

4 MS. SATAGAJ: Objection --

5 A. I don't know.

6 MS. SATAGAJ: -- to form.

7 Q. (By Mr. Freeman) Okay. There is a  
8 description of the property there on Exhibit 2, the  
9 Krishnayapalem --

10 A. Uh-huh.

11 Q. -- property.

12 A. Okay.

13 Q. Refers to Survey No. 33. Do you see that,  
14 sir?

14:17:11 15 A. Survey No. -- yes, I see that.

16 Q. Okay. Bounded by the north?

17 A. Yes.

18 Q. Okay. It says, Bounded by north, No. 33  
19 Part, South, No. 31, East, No. 33, Part West, No. 33,  
20 correct?

21 A. Yes.

22 Q. How many properties do you own in  
23 Krishnayapalem?

24 A. One property. As I -- as I just explained it  
25 before, the government has given two sites, those



14:17:45 1 sites for when they take the land, they gave two  
2 proper- -- two -- two -- two pieces of land from that  
3 that shows these two Encumbrance Certificates, Exhibit  
4 30 and Exhibit 31.

5 Q. Okay. How many --

6 A. So I don't own anything right now, so --

7 Q. How many properties in Krishnayapalem have  
8 been held in your name?

9 MS. SATAGAJ: Objection, form.

10 A. Have been held in my name?

11 Q. (By Mr. Freeman) Yes, sir.

12 A. Before or now? You're talking about now or  
13 before?

14 Q. At any point in time.

14:18:13 15 A. Yeah. At one point of time, I had one.

16 Q. Only one?

17 A. Yes.

18 Q. Okay. Is -- the property that's described in  
19 Exhibit 30, is that the same property that's described  
20 in Exhibit 2?

21 A. Yes.

22 Q. Is it?

23 A. Yes. Please, link -- take -- go to Page 2.

24 Q. Well -- so I'd like for you to look there at  
25 the description of the property --

14:18:38 1 A. Uh-huh.

2 Q. -- that's -- that's at issue in this  
3 Statement of Encumbrance of Property, and it refers to  
4 Plot No. 12/115/521?

5 A. Yeah. That's -- that's exactly was I  
6 explaining you. The -- the acreage land is given in  
7 to a plot.

8 Q. Okay.

9 A. So that's what those -- from those one  
10 acreage, we got like two plots. One is like 450  
11 square yards. The other one a thousand square yards.

12 Q. Okay.

13 A. So that's why there's two documents. And if  
14 you look at Page 3 of 3 in the Exhibit 30, that  
14:19:17 15 matches to your Exhibit 2, 0110 Development Agreement  
16 GPA.

17 Q. Okay.

18 A. Okay. So you are missing the first page  
19 basically.

20 Q. Missing the first page?

21 A. Yeah. You are missing the first page of  
22 Exhibit 30.

23 Q. Well, are we not looking at the same  
24 document?

25 A. I don't know how you -- how you got this one,

14:19:39 1 but it's missing this page where it lists Mydam  
2 Rajanna as the owner.

3 Q. What are you referring to as "missing the  
4 first page"?

5 A. Exhibit 2. Your Exhibit 2, they did a search  
6 on March 25, 2019 --

7 Q. Right.

8 A. -- right? So it should give under this --  
9 this was sold in August 28, 2018 of -- I mean, the  
10 disclosure process. So that means if somebody is  
11 searching, then, you know, it gives all the links.  
12 And, here, I don't know how you guys got -- got this  
13 one, and I don't know how they filter it out. I have  
14 no idea.

14:20:17 15 Q. Okay.

16 A. So --

17 Q. That's what I would like you to explain to  
18 me, is --

19 A. Yeah.

20 Q. -- on Exhibit 2 --

21 A. Yeah.

22 Q. -- why is the last transaction that involves  
23 your name -- why is that Line 11 of 43 on Page 3 of 6?

24 A. Page 3 of 6, (inaudible). 3 of 6, I will go  
25 there. Okay. 3 of 6, which one you're talking?

14:20:46 1 Q. Yes, sir. In Exhibit 2, is that the last  
2 time --

3 A. Yes.

4 Q. -- your name appears in --

5 A. Yes.

6 Q. -- this record?

7 A. Yes. I explained the same thing. So this --  
8 for the house site process, it was first the  
9 development process, and then finally, you know, there  
10 was logistic issues, so then finally I handed over to  
11 Mydam Rajanna.

12 Q. Okay.

13 A. Yeah.

14 Q. Please explain that in more detail.

14:21:12 15 A. Yeah. It was -- it was a -- it was in  
16 agreement with the GPA, with the government, and once  
17 they allocated the plots, the house sites, then I --  
18 I -- I basically, you know, did the closure on Mydam  
19 Rajanna -- sorry, closure on Mydam Rajanna.

20 Q. Yeah. Okay.

21 A. Yeah.

22 Q. After they gave you the sites?

23 A. Yes.

24 Q. Now, what documents that you relinquished  
25 ownership of the property reflected on Exhibit 2?

14:21:41 1 A. Yeah. This -- this is the document. This is  
2 a link, Exhibit 30 and Exhibit 31.

3 Q. And how does that demonstrate that you  
4 relinquished --

5 A. Just go to chrono- --

6 Q. -- ownership of that specific property  
7 reflected on Exhibit 2?

8 A. Yeah. Just chronological order, then you  
9 will see all the history of it. It goes back to 2015.  
10 So from 2015, you will see my name, and, you know,  
11 along -- along the process with the government with  
12 the development agreement, the sites, and finally  
13 they aw- -- they awarded the plot, and those plots  
14 were registered to Mydam Rajanna.

14:22:25 15 Q. Okay.

16 A. Yeah.

17 Q. What documentation do you have to -- to  
18 reflect the awarding of those plots?

19 A. This is the document.

20 Q. This is it?

21 A. Yes.

22 Q. There was nothing further?

23 A. Yes. I don't have anything. I have this.

24 Q. Was there a deed?

25 A. I don't have it.

14:22:40 1 Q. Why do --

2 A. There is --

3 Q. -- you not have it?

4 A. There will be a deed. I'm not owning it, so  
5 I don't have it. Raja- -- Mydam Rajanna might have  
6 it.

7 Q. Did you not -- did you have to sign that deed  
8 to assign it to him?

9 A. Yes.

10 Q. Okay. And what was -- what did you do with  
11 that deed after you signed it?

12 A. I'm done. So that's no longer my property.  
13 Mydam Rajanna will have this.

14 Q. What did Mr. Rajanna do with it?

14:23:03 15 A. I don't know.

16 MS. SATAGAJ: Objection, form.

17 Q. (By Mr. Freeman) But you maintain you signed  
18 a deed that deeded the property reflected in Exhibit  
19 30 --

20 A. Yes.

21 Q. -- to Mr. Rajanna?

22 A. Yes.

23 MS. SATAGAJ: Objection.

24 I'll withdraw this objection.

25 Q. (By Mr. Freeman) When was that done?

14:23:29 1 A. 28 -- August 28, 2018.

2 Q. Okay. And how do you know that?

3 A. I'm looking at this document.

4 Q. Okay. And what about this document indicates  
5 to you that's when you did that?

6 A. Yeah. This document is the official  
7 document, government document, so --

8 Q. Okay. When was your divorce final?

9 A. August 1, 2017.

10 Q. 2017?

11 How much did you -- did you receive any  
12 additional money in 2018 related to this property?

13 A. I got all the money already, so --

14 Q. You got it all --

14:24:10 15 A. 2016, yeah.

16 Q. -- prior years?

17 A. Yes.

18 Q. Okay. And you don't have any records that  
19 affirmatively demonstrate that the property reflected  
20 on Exhibit 2 is no longer in your ownership?

21 A. This is the affirm- -- this is the  
22 affirmative document which shows this property is not  
23 on my name. I don't own it.

24 Q. Has the property reflected in Exhibit 2 been  
25 deeded into any other person's name?

14:24:46 1 A. I -- I don't know.

2 Q. Okay. Did you ever deed the property  
3 reflected in Exhibit 2 into any other person's name?

4 A. No. I only sold it to Mydam Rajanna, and I  
5 had -- I had to do the, you know, final sale closure  
6 to Mydam Rajanna.

7 Q. Okay. Mr. Chintam, there's also an Exhibit  
8 31.

9 A. Yes.

10 Q. Do you recognize this document?

11 A. Yes.

12 Q. And did you, in fact, obtain this document?

13 A. Yes.

14 Q. Okay. And you -- how did you obtain this  
14:25:21 15 document?

16 A. It's online.

17 MS. SATAGAJ: Objection.

18 Q. (By Mr. Freeman) You obtained it online.

19 Please walk me through the process to  
20 obtain it online.

21 MS. SATAGAJ: Objection, form.

22 A. Yeah. You go to the government site. I  
23 think Apgold (phonetic) something, I don't remember.

24 Q. (By Mr. Freeman) Uh-huh.

25 A. But you can Google it. And then you, you



14:25:44 1 know, pull these details, the address. It will -- you  
2 know, it will produce that.

3 Q. Okay.

4 A. Yeah.

5 Q. Did you write on these documents in any way?

6 A. No way.

7 Q. No?

8 A. No. This is a government document. I  
9 cannot --

10 Q. Okay.

11 A. -- do anything, yeah.

12 Q. I'd like for you to turn to -- well, let's  
13 look on the first page of Exhibit 31. Did you obtain  
14 this document on November 18th of 2020?

14:26:13 15 A. Yes.

16 Q. Okay. And that second line below stating M.  
17 Rajanna?

18 A. Yes.

19 Q. It says, "M. Rajanna, having searched for a  
20 statement giving particulars of registered acts and  
21 encumbrances, if any, in respect to the underlined  
22 mentioned property."

23 Why does it state that?

24 MS. SATAGAJ: Objection --

25 A. I don't know.

14:26:36 1

MS. SATAGAJ: -- form.

2

Q. (By Mr. Freeman) You don't know?

3

A. I don't know.

4

Q. Okay. Does it state that because M. Rajanna  
5 obtained this document?

6

MS. SATAGAJ: Objection, form.

7

A. I -- I have no idea.

8

Q. (By Mr. Freeman) Well, how would you have no  
9 idea?

10

A. Look at the factor, right? You look at the  
11 fact. What are you looking for? You're -- you're  
12 looking for who is the current owner, right?

13

Q. No. I'm -- I'm asking you -- I'm asking you,  
14 sir --

14:27:01 15

A. Yeah.

16

Q. -- about how this document was obtained.

17

A. What difference it will make?

18

Q. I'm asking you --

19

A. And I'm asking you.

20

Q. -- how this document was obtained?

21

A. I'm asking you. Like, you have a -- you have  
22 a government property.

23

MS. SATAGAJ: Objection, form.

24

A. It shows who is the current owner. That's  
25 the end of the story.

14:27:17 1 Q. (By Mr. Freeman) Okay. Did you travel to  
2 India to obtain this document?

3 A. No.

4 Q. All right. Did you request that Mr. Rajanna  
5 obtain this document?

6 MS. SATAGAJ: Objection, form.

7 A. No.

8 Q. (By Mr. Freeman) No?

9 Did Mr. Rajanna obtain this document?

10 MS. SATAGAJ: Objection --

11 A. No.

12 MS. SATAGAJ: -- form?

13 Q. (By Mr. Freeman) Why is his name reflected on  
14 the second line?

14:27:35 15 A. I don't know.

16 MS. SATAGAJ: Objection form.

17 Q. (By Mr. Freeman) Okay. On the third page of  
18 this document, did you make any of these markings?

19 A. Which page?

20 Q. The third page. It's Bates labeled  
21 OWLS000456.

22 A. No.

23 Q. Okay. Is this document a true and correct  
24 copy of the document you obtained online?

25 A. Yes.

14:28:04 1 Q. Okay. And is Exhibit 30 a true and correct  
2 copy of the document you obtained online?

3 A. Yes.

4 Q. Okay. On this Exhibit 31, the third page,  
5 who made those markings?

6 MS. SATAGAJ: Objection, form.

7 A. Yeah, I don't -- I don't know.

8 Q. (By Mr. Freeman) Okay. And what date is  
9 reflected on the -- the stamp?

10 MS. SATAGAJ: Objection, form.

11 A. (Inaudible.)

12 THE REPORTER: I'm sorry? What did you  
13 say?

14 A. I -- I don't know. It doesn't give anything  
14:28:39 15 here.

16 Q. (By Mr. Freeman) Is there a stamp there? Do  
17 you see that?

18 A. No.

19 Q. Okay. Does it state there -- on No. 3, it  
20 says, "Search made and certificate prepared by." Do  
21 you see that?

22 A. Uh-huh.

23 Q. And does it appear to say Lizzy? Lezzy? Do  
24 you know what that --

25 A. No.

14:28:59 1 Q. -- name is?

2 A. No.

3 Q. Okay. And then is there a -- a stamp to the  
4 right of that?

5 A. Yes.

6 Q. And what language is that written in?

7 A. That's Telugu.

8 Q. Okay. Do --

9 (Reporter clarification.)

10 Q. (By Mr. Freeman) Are you able to read that  
11 language?

12 A. No.

13 Q. You can't?

14 A. No, I can't.

14:29:21 15 Q. Okay. And does there appear to be a  
16 signature on that page?

17 A. Yes.

18 Q. Okay. And below the words on this page that  
19 say "Office Seal and Date," it states, "Signature of  
20 Register Officer"?

21 A. Yes.

22 Q. Okay. And below that, it says "Received an  
23 amount of Rs.200 towards EC fee and Rs.20 towards user  
24 charges from Mr./Ms. Rajanna;" is that correct?

25 A. Yes.

14:29:55 1 Q. Okay. Did Mr. Rajanna pay for this?  
2 MS. SATAGAJ: Objection, form.  
3 A. I don't know.  
4 Q. (By Mr. Freeman) Okay. Did you reimburse  
5 Mr. Rajanna for this?  
6 MS. SATAGAJ: Objection, form.  
7 A. No. I don't know.  
8 Q. (By Mr. Freeman) Okay. Why does it state  
9 that?  
10 MS. SATAGAJ: Objection, form.  
11 A. I don't know.  
12 Q. (By Mr. Freeman) Okay. Had you read that  
13 before today?  
14 A. No.  
14:30:17 15 Q. Okay. And as we sit here today, you -- you  
16 have no explanation for Mr. Rajanna's -- for this  
17 document stating that Mr. Rajanna paid 200 rupees for  
18 this document?  
19 A. Yes.  
20 MS. SATAGAJ: Objection, form.  
21 Q. (By Mr. Freeman) Okay. Mr. Chintam, I'd like  
22 for you to look at Exhibit 4.  
23 A. Okay.  
24 Q. Okay. Do you recognize this document?  
25 A. Yes. It looks like it's Pangra.

14:31:25 1 Q. Okay. And what is this document?  
2 A. It's an Encumbrance Certificate.  
3 Q. Okay. Was this produced to you by Ms. Adema?  
4 A. This one, I mean, I've --  
5 Q. Have you --  
6 A. I've --  
7 Q. -- seen it before?  
8 A. I've not seen it. Yeah, I've not seen it.  
9 Q. No?  
10 Take a minute -- take a second to look at  
11 that, if you would.  
12 A. Yes.  
13 Q. Does that appear to be a true and correct  
14 copy of what it reflects?  
14:31:52 15 A. It's not.  
16 Q. It's not? Why is that?  
17 A. This is a true and correct copy of the latest  
18 current owner.  
19 Q. Okay. But I'm asking you -- please, maintain  
20 that.  
21 A. Yeah.  
22 Q. I'm asking you: Is Exhibit 6 -- Exhibit 4,  
23 is that a true and correct copy of a Statement of  
24 Encumbrance on property as of April 2nd, 2019?  
25 A. No, it's not.

14:32:22 1 Q. Okay. And you haven't seen this document  
2 before?

3 A. No.

4 Q. Okay. And if you'll look to the bottom  
5 right-hand corner, it has the Bates label Adema000027.

6 A. Yes.

7 Q. Do you see that?

8 A. Yes.

9 Q. Okay. And do you understand that to mean  
10 that it's a document that Ms. Adema has produced in  
11 this case?

12 A. Yes.

13 Q. Okay. Am I correct, the date on this  
14 document is April 2nd, 2019?

14:32:48 15 A. Yes.

16 Q. And what property is this document?

17 A. Pangra.

18 Q. Pangra?

19 So is this the Pangra property?

20 A. Yes.

21 Q. The Pangra property at issue in this case?

22 A. Yes.

23 Q. Okay. Do you currently own this property?

24 A. No.

25 Q. Okay. Look at Page 1. Does your name appear



14:33:04 1 there?

2 A. The copy, yes, but it doesn't have the latest  
3 current owner.

4 Q. Okay. But --

5 A. So I am not the current owner.

6 Q. I understand.

7 If you'll look at that, your name is  
8 reflected there on the top line, correct?

9 A. Yes. But the -- the problem, please  
10 understand, they -- they've not taken the latest  
11 Encumbrance Certificate. So we give you the document,  
12 so please look at the Pangra --

13 Q. Okay.

14 A. -- Encumbrance Certificate, please.

14:33:29 15 Q. Okay.

16 A. Thank you.

17 Q. Mr. Chintam, ma- -- staying with Exhibit 4,  
18 does that reflect that you purchased this property?

19 A. Yes.

20 Q. Okay. And as of November 25th, 2013; is that  
21 correct?

22 A. Yes.

23 Q. Okay. And with respect to this property, on  
24 this document dated April 2nd, 2019, it does not  
25 reflect that you had transferred ownership to that

14:33:56 1 property, correct?

2 A. Yeah. This document, that's correct.

3 Q. Okay.

4 A. But you -- you need to introduce a new  
5 exhibit with the latest Encumbrance Certificate.

6 MS. SATAGAJ: Objection, nonresponsive.

7 Q. (By Mr. Freeman) This document does not  
8 reflect you selling the property as of April 2nd,  
9 2019, does it?

10 A. This is the wrong document.

11 Q. Okay.

12 A. They don't have the latest document.

13 Q. Okay. Did you own the Pangra property as of  
14 April 2nd, 2019?

14:34:27 15 A. No.

16 Q. Okay. When you purchased this property, what  
17 was it used for?

18 A. It's just a piece of land.

19 Q. Okay. Did you do anything with it?

20 A. No.

21 MS. SATAGAJ: Objection, form.

22 Q. (By Mr. Freeman) Did you invest any  
23 additional money into it?

24 A. No.

25 MS. SATAGAJ: Objection, form.

14:34:44 1 Q. (By Mr. Freeman) Did you rent it?  
2 MS. SATAGAJ: Objection, form.  
3 A. No.  
4 Q. (By Mr. Freeman) Okay. Did anyone oversee  
5 it?  
6 MS. SATAGAJ: Objection, form.  
7 A. No.  
8 Q. (By Mr. Freeman) Or manage it?  
9 A. No.  
10 Q. Did it generate any revenues?  
11 A. No.  
12 MS. SATAGAJ: Objection to form.  
13 Q. (By Mr. Freeman) Okay. What did you plan to  
14 do with it?  
14:35:00 15 MS. SATAGAJ: Objection, form.  
16 A. It's already sold, so I'm not even the  
17 current owner, so --  
18 Q. (By Mr. Freeman) When -- when your purchased  
19 it, what did you plan to do with it?  
20 A. Nothing. Just -- yeah, just keep a --  
21 Q. Just buy it?  
22 A. Yeah. Just keep and hold and sell it.  
23 Q. Okay.  
24 A. So, I mean --  
25 Q. Did you anticipate it would go up in value?

14:35:14 1 Did you just hold it?

2 A. I hold it a little bit, and I sold it, so --

3 Q. Okay. How did you purchase this document --  
4 or this property?

5 MS. SATAGAJ: Objection, form.

6 A. How did I purchase this property?

7 Q. (By Mr. Freeman) Yes, sir.

8 A. Just like any other property, yeah.

9 Q. Okay. Can you explain it to me?

10 A. I don't understand your question.

11 Q. Were there -- were there other individuals  
12 involved?

13 MS. SATAGAJ: Objection --

14 A. No.

14:35:44 15 MS. SATAGAJ: -- form.

16 Q. (By Mr. Freeman) Were there documents  
17 executed?

18 MS. SATAGAJ: Objection, form.

19 A. Yes.

20 Q. (By Mr. Freeman) Was there a contract to  
21 purchase it?

22 A. I don't --

23 MS. SATAGAJ: Objection, form.

24 A. -- remember.

25 Q. (By Mr. Freeman) Okay. Do you have a copy of

14:35:55 1 that contract?

2 MS. SATAGAJ: Objection, form.

3 A. I don't have it.

4 Q. (By Mr. Freeman) No?

5 Have you searched for a copy of that  
6 contract?

7 MS. SATAGAJ: Objection, form.

8 A. No.

9 Q. (By Mr. Freeman) Okay. Have you made any  
10 attempts to find that contract?

11 MS. SATAGAJ: Objection, form.

12 A. No.

13 Q. (By Mr. Freeman) Okay. Did you -- of that  
14 property, did you pay cash for that property?

14:36:19 15 MS. SATAGAJ: Objection, form.

16 A. I don't remember. It's been a long time,  
17 seven years, eight years back, so --

18 Q. (By Mr. Freeman) Okay. You -- you don't know  
19 if you used a bank account to purchase that property?

20 A. I have no idea.

21 Q. Okay.

22 A. I don't remember.

23 Q. Was anyone else physically there?

24 MS. SATAGAJ: Objection, form.

25 A. I don't remember.

14:36:35 1 Q. (By Mr. Freeman) Were you physically there to  
2 execute the document?

3 MS. SATAGAJ: Objection, form.

4 A. I -- I don't remember, so --

5 Q. (By Mr. Freeman) Did you have anyone assist  
6 you in purchasing this property?

7 MS. SATAGAJ: Objection, form.

8 A. I don't remember.

9 (Deposition Exhibit No. 32 was marked.)

10 MR. FREEMAN: Okay. Let's go ahead and  
11 introduce Exhibit 32.

12 MS. SATAGAJ: Yes.

13 Q. (By Mr. Freeman) And, Mr. Chintam --

14 THE REPORTER: Wait, wait.

14:37:23 15 MS. SATAGAJ: Did you say we're 32?

16 MR. FREEMAN: Yes.

17 MS. SATAGAJ: Okay. Thank you.

18 Q. (By Mr. Freeman) Mr. Chintam, do you  
19 recognize Exhibit 32?

20 A. Yes.

21 Q. Okay. And what is this document?

22 A. This is an Encumbrance Certificate for  
23 Pangra.

24 Q. Okay. When did you -- did you obtain this  
25 document?

14:37:37 1 MS. SATAGAJ: Objection, form.  
2 A. Yes.  
3 Q. (By Mr. Freeman) Where did you obtain this  
4 document from?  
5 MS. SATAGAJ: Objection, form.  
6 A. Somebody helped me.  
7 Q. (By Mr. Freeman) Okay. Who helped you?  
8 A. Praveen.  
9 Q. Can you spell that for us?  
10 A. P-r-a-v-e-e-n.  
11 Q. Okay. Who is Praveen?  
12 A. He's just a -- a broker/agent.  
13 Q. Okay. Does he live in India?  
14 A. Yes.  
14:38:11 15 MS. SATAGAJ: Objection, form.  
16 Q. (By Mr. Freeman) Okay. Why didn't you obtain  
17 this document online?  
18 A. I could not find it, so --  
19 Q. Okay.  
20 A. Yeah.  
21 Q. You asked Praveen?  
22 A. Yes.  
23 Q. Okay. And is this document dated November  
24 7th, 2020?  
25 A. Yes.

14:38:31 1 Q. Okay. Is there a reason that this document  
2 was just produced to me this week of your deposition?

3 MS. SATAGAJ: Objection, form.

4 A. I have no idea.

5 Q. (By Mr. Freeman) Okay.

6 A. I gave it to my attorney, so --

7 Q. And when did you give it to your attorneys?

8 MS. SATAGAJ: Objection, form. I'm  
9 instructing the witness not to answer. It invades  
10 attorney-client privilege.

11 Q. (By Mr. Freeman) But this reflects one in the  
12 same Pangra property that's reflected on Exhibit 4 of  
13 this deposition. Is that what you maintain?

14 A. Yes.

14:39:10 15 Q. Okay. And the date of the first -- the first  
16 transaction listed on this Exhibit 32 is -- is that  
17 August 29th, 2018?

18 A. Yes.

19 Q. And do you maintain that that is a  
20 document -- that is a transaction whereby you  
21 transferred the property to someone?

22 A. Yeah. I mean, the contract -- we were under  
23 contract in 2016. As you know, it had a court case,  
24 so, you know, due to some issues with the passbook, I  
25 could not do the registration, so I had to take care



14:39:48 1 of it later in 2018. So, you know, officially it was  
2 sold in 2016.

3 Q. Okay. But it shows up on the official  
4 government --

5 A. Yes.

6 Q. -- records --

7 A. Yes.

8 Q. -- as being sold on 8/29/2018?

9 A. Yes.

10 Q. Okay. And did you, in fact, transfer the --  
11 the title on 8/29/2018?

12 A. Yeah. That's the date that I did transfer.

13 Q. And that was after the divorce, correct?

14 A. Yes.

14:40:13 15 Q. So you transferred the title to the Pangra  
16 property after your divorce?

17 MS. SATAGAJ: Objection, form.

18 A. Yes.

19 Q. (By Mr. Freeman) Okay.

20 A. We -- we had the court award that clearly  
21 shows we had an issue with the passbook. So I had  
22 delay in getting the passbook, so that was the reason  
23 for the delay of executing in 2018.

24 Q. Okay. Why does this transaction listed here  
25 on the first line of Exhibit 32 reflecting a date of

14:40:46 1 August 29th, 2018 not show up on Exhibit 4?

2 A. I cannot answer that because I did not  
3 produce this document.

4 Q. Okay.

5 A. So maybe you should ask the people who --

6 MS. SATAGAJ: Objection, nonresponsive  
7 after his prior answer.

8 Q. (By Mr. Freeman) But this Exhibit No. 4 bares  
9 a date of April 2nd, 2019; is that correct?

10 A. Yes.

11 Q. And you have no explanation for why a  
12 transaction dated August 29th, 2018 is not reflected  
13 on it?

14 MS. SATAGAJ: Objection, form.

14:41:22 15 A. Again, I'm not an expert in this one, so  
16 you -- yeah, you should ask the people who gave this  
17 to.

18 Q. (By Mr. Freeman) Okay. I need to ask someone  
19 else?

20 A. Ask the people who generated this.

21 Q. Can you tell me why, if you look here on the  
22 statement -- the ST/STMT line, it states, "Boddu  
23 Sayanna, having searched for a statement giving  
24 particulars of registered acts and encumbrances, if  
25 any, in respect of the under mentioned property."

14:41:59 1 Can you tell me why it reflects the name  
2 Boddu Sayanna?  
3 A. I don't know.  
4 MS. SATAGAJ: Objection, form.  
5 Q. (By Mr. Freeman) No?  
6 A. No, I have no idea.  
7 Q. Okay. And can you turn to the second page of  
8 this document?  
9 A. Yes.  
10 Q. Okay. And can you -- can you read what is  
11 reflected there in the second page?  
12 A. It's "Declaration by Authorized Agent for  
13 Delivering the Electronic Services."  
14 Q. Okay. And have you seen a page like this  
14:42:29 15 before?  
16 A. Yeah. This is -- I'm seeing this first time.  
17 Q. Okay. You've not read this document?  
18 A. No.  
19 Q. Okay. When did you re- -- receive this  
20 document?  
21 MS. SATAGAJ: Objection, form.  
22 A. I don't remember.  
23 Q. (By Mr. Freeman) Okay. Mr. Chintam, so you  
24 have owned property in India?  
25 A. I had owned that property but not anymore.

14:43:05 1 Q. Okay. When I took your deposition in 2018,  
2 if you stated "I have not transferred any properties  
3 in the last two years," would that have been correct?

4 MS. SATAGAJ: Objection, form.

5 A. I have no memory what -- what went on in that  
6 deposition.

7 Q. (By Mr. Freeman) Okay.

8 A. So --

9 Q. What all properties have you transferred or  
10 sold in India?

11 MS. SATAGAJ: Objection, form.

12 A. I sold the properties which she listed in her  
13 petition.

14 Q. (By Mr. Freeman) Uh-huh. Okay. Is that it?

14:43:44 15 No others?

16 A. Yes.

17 Q. You haven't transferred any other properties?

18 A. Yes.

19 Q. Ex- -- except those reflected on Exhibit 30  
20 and 31?

21 A. No. We -- you have bunch of other stuff,  
22 right?

23 Q. But are those properties reflected in the  
24 petition?

25 A. Which petition?

14:44:03 1 Q. The -- the properties reflected on Exhibit 30  
2 and 31. --

3 A. Uh-huh.

4 Q. -- are they reflected in the petition that  
5 you just referenced?

6 A. Do you mean the current lawsuit?

7 Q. Correct.

8 A. Yeah, they're all there.

9 Q. Okay. Have you ever owned property in an  
10 area named Miyapur?

11 A. Yes.

12 Q. Okay. And if you will look at Exhibit 6,  
13 sir.

14 A. Okay. Exhibit 6.

14:44:32 15 Q. Do you recognize this document?

16 A. Yes.

17 Q. Okay. And is this a document reflecting  
18 ownership information with respect to the Miyapur  
19 property at issue in this case?

20 A. Yes.

21 Q. Okay. And have you seen this document  
22 before?

23 A. No.

24 Q. No?

25 If you look below on the right-hand

14:44:55 1 corner, does it state ADEMA000301?

2 A. No. It's 158. Maybe I'm looking at the  
3 wrong one.

4 Q. I think you may be on Exhibit 5.

5 A. Okay.

6 MS. SATAGAJ: Exhibit 6.

7 A. Oh, okay. Oh, sorry. Yes.

8 Q. (By Mr. Freeman) Okay. And have you seen  
9 this document before, sir?

10 A. No.

11 Q. Okay. If -- does it appear to be a document  
12 reflecting ownership of the Miyapur property at issue  
13 in this case?

14 A. It says Chintam Bhoomanna, Appala Rajanna.

14:45:29 15 Yes. But like I produced the Encumbrance Certificate,  
16 for that.

17 Q. Okay.

18 A. That -- he's not the current owner.

19 Q. Does this appear to be -- does it state that  
20 it's a Statement of Encumbrance on the property?

21 A. It's not the latest one.

22 Q. Okay. Is -- is that, in fact, though what it  
23 is?

24 A. It's an old one.

25 Q. Okay. Is it dated with 3/22/2019?

14:45:55 1 A. Yeah.

2 Q. Okay.

3 A. Yes, it says 22 -- yes, 3/22/2019.

4 Q. Okay. So this document below right before  
5 the -- the actual property records states, "I hereby  
6 certify that search has been made in Book 1 and in the  
7 indexes relating to -- thereto S.R.O. Ranga Reddy for  
8 29 years from 1/1/1990 to 21/3/2019 for acts and  
9 encumbrances affecting the said property, and that on  
10 such search, the folling acts and encumbrances  
11 appear."

12 Is that correct?

13 A. Yes.

14 Q. So does that state that this reflects the  
14:46:33 15 property records in their system as of March 21, 2019?

16 A. Yes.

17 Q. Okay. Did you ever transfer this property?

18 A. I sold the property.

19 Q. Okay. Does this document reflect that at one  
20 time you owned this property?

21 A. Yes.

22 Q. Okay. And is that reflected on the first  
23 page?

24 A. Yes.

25 Q. Is that on Line 2 of 5?

14:46:54 1 A. Yes.

2 Q. And is that where you purchased in property  
3 on April 15, 2011?

4 A. Yes.

5 Q. Okay. And then what does it -- what does it  
6 state after that that you did with this property?

7 A. With this property? Yeah, we --

8 Q. Yes, sir.

9 A. We did the construction of the building.

10 Q. Okay.

11 A. Yeah.

12 Q. What construction of the building?

13 A. Just like a house -- apartment.

14 Q. Okay. So you built an apartment?

14:47:21 15 A. Yes.

16 MS. SATAGAJ: Objection, form.

17 Q. (By Mr. Freeman) Okay. How much did it cost  
18 to build that apartment?

19 MS. SATAGAJ: Objection, form.

20 A. I don't remember.

21 Q. (By Mr. Freeman) Okay. Who did the building?

22 MS. SATAGAJ: Objection, form.

23 A. I don't remember.

24 Q. (By Mr. Freeman) Okay. When did you build  
25 this apartment?



14:47:35 1 MS. SATAGAJ: Objection, form.  
2 A. I don't remember.  
3 Q. (By Mr. Freeman) How many apartments have you  
4 built?  
5 MS. SATAGAJ: Objection, form.  
6 A. No, I don't remember.  
7 Q. (By Mr. Freeman) You don't know how many  
8 apartments you've built?  
9 A. No.  
10 Q. Is it more than one?  
11 A. I don't --  
12 MS. SATAGAJ: Objection --  
13 A. -- know.  
14 MS. SATAGAJ: -- form.  
14:47:48 15 Q. (By Mr. Freeman) Okay. What -- does this  
16 reflect that on March 27th, 2017 you deeded this  
17 property to Appala Rajanna?  
18 A. Yes.  
19 Q. Okay. Did you, in fact, deed this property  
20 to Appala Rajanna?  
21 A. Yes.  
22 Q. On March 27th, 2017?  
23 A. Yes.  
24 Q. Okay. Did you travel to India to -- to  
25 execute this document?

14:48:17 1 MS. SATAGAJ: Objection, form.

2 A. I -- I don't remember.

3 Q. (By Mr. Freeman) You don't remember --

4 A. Yes.

5 Q. -- if you traveled to India --

6 A. No.

7 Q. -- in March of 2017?

8 MS. SATAGAJ: Objection --

9 A. No.

10 MS. SATAGAJ: -- form.

11 Q. (By Mr. Freeman) And you don't remember if

12 you were in India to execute the transfer of the

13 Miyapur property?

14 MS. SATAGAJ: Objection --

14:48:31 15 A. Yeah --

16 MS. SATAGAJ: -- form.

17 A. -- I don't remember.

18 Q. (By Mr. Freeman) Okay. Was there any

19 particular documentation necessary to transfer the

20 apartments?

21 MS. SATAGAJ: Objection, form.

22 A. It's like -- it's like -- it's like a deed --

23 sale deed.

24 Q. (By Mr. Freeman) Okay.

25 A. Yeah.

14:48:47 1 Q. And is that the only documentation on this  
2 property?

3 A. Yes. And obviously the Encumbrance  
4 Certificate.

5 Q. Correct. So the government Encumbrance --

6 A. Yeah.

7 Q. -- Certificate?

8 A. Yes.

9 Q. And -- and that reflects each of the  
10 transactions that have been submitted to the  
11 government?

12 A. Yes.

13 Q. Okay. Was there a contract for the sale of  
14 the Miyapur property?

14:49:10 15 A. I don't remember.

16 Q. Okay. And you don't remember how much you  
17 received for selling the Miyapur property?

18 A. Well, I think --

19 MS. SATAGAJ: Objection, form.

20 A. -- we -- yeah, we reported that. It's part  
21 of the settlement agreement. I don't remember the  
22 number, but it's part of our mediation settlement  
23 agreement that was done in 2017, so --

24 Q. Is it?

25 A. Yes.

14:49:29 1 Q. You -- you placed that -- the precise amount  
2 that you received in --

3 A. Yes.

4 Q. -- the mediation settlement agreement?

5 A. Yes.

6 MS. SATAGAJ: Objection, form.

7 Q. (By Mr. Freeman) Okay. And you don't  
8 remember how much that was, though?

9 A. I don't remember.

10 MS. SATAGAJ: Objection, form.

11 Q. (By Mr. Freeman) Okay.

12 A. And for the same thing, I would like to  
13 present the latest Encumbrance Certificate, so --

14 MS. SATAGAJ: Objection, nonresponsive.

14:49:54 15 Q. (By Mr. Freeman) Mr. Chintam, I'm -- I'm --  
16 I'll go ahead and introduce it for you.

17 MR. FREEMAN: Let's mark as Exhibit 33 --

18 (Deposition Exhibit No. 33 was marked.)

19 Q. (By Mr. Freeman) Okay. Mr. Chintam, I  
20 believe this is the document you were just  
21 referencing.

22 A. Yes. Which one --

23 Q. Is that correct?

24 A. Can I see? I don't know which one you're  
25 seeing.

14:50:33 1 Q. Exhibit 33.

2 A. Exhibit -- I can't see it. Can you give me  
3 one --

4 Q. Yes, sir.

5 A. Yes.

6 Q. Okay. And you're -- you have a copy of  
7 Exhibit 33 there with you?

8 A. Yes.

9 Q. Okay. Did you obtain this document?

10 A. Yes.

11 Q. Okay. And how did you obtain this document?

12 A. Online.

13 MS. SATAGAJ: Objection, form.

14 A. Online.

14:50:57 15 MR. FREEMAN: What's the basis? I'm  
16 annoying? I'll settle for that and call it even if  
17 that's the obj- -- if that's the basis.

18 MS. SATAGAJ: Unofficially annoying.  
19 Officially how he got the documents is not relevant.

20 Q. (By Mr. Freeman) All right. This Exhibit 33,  
21 you obtained this online you said, correct?

22 A. Yes.

23 Q. Okay. What website did you use to obtain  
24 this?

25 A. I -- I don't know. I just Googled it. I

14:51:35 1 don't remember the website name.

2 Q. Okay. When did you obtain this?

3 MS. SATAGAJ: Objection, form.

4 A. This one I -- yeah, I don't remember.

5 Q. (By Mr. Freeman) Okay. I'll represent to  
6 you, sir, that this was just provided to me this week  
7 of your deposition, okay?

8 A. Okay.

9 Q. So I have not had much of any chance to  
10 review it.

11 A. Okay.

12 Q. This document, does it state that it is  
13 related to the Village of Miyapur, and there's a  
14 property description there?

14:52:10 15 A. Yes.

16 Q. Okay. And below that, does it say that  
17 "Search has been made in Book 1 and in the indexes  
18 relating to 38 years from January 1, 1983 to January  
19 27, 2021 for acts and encumbrances affecting the said  
20 property"?

21 A. Yes.

22 Q. Okay. And did you run that search online?

23 A. Yes.

24 Q. Okay. And what is it that you want to tell  
25 me about this document?

14:52:36 1 A. All right. So like you -- your -- your  
2 document is showing, you know, I -- I sold this  
3 property to Appala Rajanna.

4 Q. Yes, sir.

5 A. But if you look at my document, this was sold  
6 to somebody else, Yerram Sai Priya.

7 Q. Okay. Now --

8 A. So Appala Rajanna is not the current owner.

9 Q. Okay.

10 A. Yerram Sai Priya is the current owner.

11 Q. Okay.

12 A. That's what this document says.

13 Q. Do you know Yerram Sai Priya?

14 A. No.

14:53:06 15 Q. Okay. On Line 2 of 5, does that reflect a  
16 sale from you to Appala Rajanna?

17 A. Yes.

18 Q. Okay. And does that reflect that you sold  
19 this Miyapur property to Appala Rajanna on March 27th,  
20 2017?

21 A. Yes.

22 Q. Okay. And you did, in fact, sell the  
23 property on March 27, 2017 to --

24 A. No.

25 Q. -- Appala Rajanna?

14:53:32 1 A. The contract was in 2016, but this -- this --  
2 this document, that sale, like the closing happened in  
3 2017.

4 Q. Okay.

5 A. March 27.

6 Q. Did you produce copies of -- of the contract  
7 for this property during your divorce?

8 A. We gave everything on -- on the mediation  
9 day.

10 Q. Okay. Did you produce copies of it in  
11 discovery in the divorce?

12 MS. SATAGAJ: Objection --

13 A. I --

14 MS. SATAGAJ: -- form.

14:53:57 15 A. -- don't remember.

16 Q. (By Mr. Freeman) Okay. How did you -- how  
17 did you purchase this property originally?

18 MS. SATAGAJ: Objection, form.

19 A. I don't remember.

20 Q. (By Mr. Freeman) All right.

21 A. A long time back.

22 Q. Do you know when you purchased it?

23 MS. SATAGAJ: Objection, form.

24 A. I don't remember.

25 Q. (By Mr. Freeman) Was it in 2011?



14:54:18 1 A. I don't remember.  
2 Q. Okay. Do you remember how you paid for it?  
3 A. I don't --  
4 MS. SATAGAJ: Objection --  
5 A. -- remember.  
6 MS. SATAGAJ: -- form.  
7 Q. (By Mr. Freeman) Okay. Do you remember if a  
8 bank account was involved?  
9 A. I don't --  
10 MS. SATAGAJ: Objection --  
11 A. -- remember.  
12 MS. SATAGAJ: -- form.  
13 Q. (By Mr. Freeman) Do you remember if there  
14 were any documents?  
14:54:32 15 MS. SATAGAJ: Objection, form.  
16 A. No, I don't remember.  
17 Q. (By Mr. Freeman) Have you made any attempt to  
18 find any documents related to -- related to the  
19 Miyapur property?  
20 MS. SATAGAJ: Objection --  
21 A. No.  
22 MS. SATAGAJ: -- form.  
23 Q. (By Mr. Freeman) Have you made any attempt  
24 to obtain documents in your emails related to the  
25 Miyapur property?

14:54:52 1 MS. SATAGAJ: Objection --

2 A. No.

3 MS. SATAGAJ: -- form.

4 Q. (By Mr. Freeman) Do you not believe you have  
5 any obligation to do that?

6 MS. SATAGAJ: Objection, form.

7 A. I -- I don't know. I don't -- I -- I -- I  
8 did not have a need for that, so -- I mean, I'm not  
9 the current owner or anything. I have nothing to do  
10 with that property, so there's no point of spending  
11 time on which you don't own it.

12 Q. (By Mr. Freeman) So -- and because you  
13 maintain you don't own this property, you didn't --  
14 you didn't feel any need to search your records to  
14:55:16 15 see --

16 A. Yes.

17 Q. -- if you had any documents related to it?

18 A. Yes.

19 MS. SATAGAJ: Objection, form.

20 Q. (By Mr. Freeman) Okay. And as we sit here  
21 today, that -- that is still a correct statement of  
22 what you have and have not done, correct?

23 A. Yeah. I'm --

24 MS. SATAGAJ: Objection, form.

25 A. I'm not the current owner, so --

14:55:30 1 Q. (By Mr. Freeman) So no need to --  
2 A. Yes.  
3 Q. -- search for any documents?  
4 A. I gave the documents.  
5 Q. Okay.  
6 A. This -- I produced this document.  
7 Q. Th- -- this Exhibit 33?  
8 A. Yes.  
9 Q. Okay. And that's the document I'm -- we're  
10 talking about right now, correct?  
11 A. Yes.  
12 Q. It relates to the Miyapur at issue in this  
13 case?  
14 A. Yes.  
14:55:49 15 Q. Okay. And you transfer this document on  
16 March 27, 2017, right?  
17 A. Yes.  
18 Q. Okay. Is that after February 7th, 2017?  
19 A. Yes.  
20 Q. Okay. So did you, in fact, transfer a  
21 property after filing for divorce?  
22 MS. SATAGAJ: Objection, form.  
23 A. The contract was in 2016, so --  
24 Q. (By Mr. Freeman) Okay.  
25 A. So, yeah. Contact was in 2016. Only this

14:56:16 1 legal formality happened 2017, so --

2 Q. Were you -- did you discuss property  
3 transactions with Deepa?

4 A. Yeah. She knows everything.

5 Q. Okay. You had a lot of discussions with her  
6 about this property?

7 A. Yes, yeah.

8 Q. All right. And she was aware of the contract  
9 to sell it?

10 A. I don't know what she remembers, but we  
11 spoke, so --

12 Q. Did you ever provide her a copy of the  
13 contract to sell it?

14 MS. SATAGAJ: Objection, form.

14:56:40 15 A. I don't remember.

16 Q. (By Mr. Freeman) Did you ever have an  
17 electronic copy of the contract to sell it?

18 A. I --

19 MS. SATAGAJ: Objection, form.

20 A. -- don't know.

21 Q. (By Mr. Freeman) Have -- and you wouldn't  
22 know because you haven't -- you haven't looked?

23 A. I don't --

24 MS. SATAGAJ: Objection, form.

25 A. -- remember, yeah.

14:56:51 1 Q. (By Mr. Freeman) Okay. Was -- this transfer  
2 on March 27, 2017, was this in violation of the  
3 Court's standing order?

4 A. I don't --

5 MS. SATAGAJ: Objection, form.

6 A. -- think so.

7 Q. (By Mr. Freeman) Okay.

8 (Reporter clarification.)

9 Q. (By Mr. Freeman) Okay.

10 A. Because the -- the contract was this 2016,  
11 so --

12 Q. Okay. And did you disclose this property  
13 transfer to your attorneys during the divorce?

14 MS. SATAGAJ: Objection. I'm instructing  
14:57:19 15 the witness not to answer. It invades attorney-client  
16 privilege.

17 Q. (By Mr. Freeman) Mr. Chintam, I'll ask you to  
18 look at Exhibit 17.

19 A. Exhibit 17.

20 Q. Yes, sir.

21 A. Okay.

22 Q. Do you recognize this document?

23 A. Yeah. This looks like a sale deed.

24 Q. Okay. What is this -- this is a sale deed?

25 A. Yes.

14:57:53 1 Q. Okay. And what does it reflect the sale of?  
2 A. This reflect the sale -- what is it? Yeah,  
3 it looks like it's Miyapur village.  
4 Q. Okay. So Miyapur village?  
5 A. Uh-huh.  
6 Q. Is in the Miyapur document --  
7 A. Yes.  
8 Q. -- that we were just --  
9 A. Yes.  
10 Q. -- discussing?  
11 A. Uh-huh.  
12 Q. Okay. And what is the date of this document?  
13 A. March 27, 2017.  
14 Q. March -- excuse me?  
14:58:24 15 A. March 27 -- 03/27/2017.  
16 Q. Okay. And where do you see that?  
17 A. On Page -- at MA000145.  
18 Q. Okay. If you'll look at the beginning  
19 document of Exhibit 17, sir.  
20 A. Uh-huh.  
21 Q. What is the date of this document?  
22 A. This document?  
23 Q. Yes, sir.  
24 A. It says 22/03/2019.  
25 Q. Okay. And is there any reason to believe

14:58:54 1 that this is not what it purports to be?

2 A. I have no idea of this document.

3 Q. Okay.

4 A. Yeah.

5 Q. No idea?

6 A. Yeah, I have no idea.

7 Q. Have you ever seen this document before?

8 A. No.

9 Q. Okay. And is -- the bottom right-hand  
10 corner, does it state ADEMA000140?

11 A. Yes.

12 Q. Okay. Do you understand that to be a  
13 document that was produced by Ms. Adema?

14 A. Yes, looks like.

14:59:22 15 Q. Okay. And does this document lists Appala  
16 Rajanna as the buyer?

17 A. Yes. That's what -- if you look at the  
18 142 -- Page No. 142.

19 Q. Okay. So that lists Appala Rajanna?

20 A. Yes.

21 Q. Okay. And does that -- on Page 142, does  
22 that reflect a -- a date of March 27th, 2017?

23 A. It has March 23, 2017.

24 Q. Correct, March 23?

25 A. Yes.

14:59:54 1 Q. Okay. On Page 4 of this document, who is G.  
2 Srinhar [sic]?

3 A. Who is G. Sridhar?

4 Q. S-I-n -- S-i-r-d-h-a-r, do you see that name?

5 A. Yes.

6 Q. Okay. Who is that?

7 A. I don't remember.

8 Q. Okay. You didn't know them?

9 A. I don't remember, yeah.

10 Q. Okay. Was it someone you knew?

11 MS. SATAGAJ: Objection, form.

12 A. I don't remember, no.

13 Q. (By Mr. Freeman) Okay. Why is their name  
14 signed the document?

15:00:30 15 MS. SATAGAJ: Objection, form.

16 A. I don't remember. It's a witness.

17 Q. (By Mr. Freeman) Okay.

18 A. Yeah.

19 Q. And there's another name there, CH Santhosh.

20 A. Yes.

21 Q. Do you know who that is?

22 A. Yes.

23 MS. SATAGAJ: Objection, form.

24 Q. (By Mr. Freeman) Who is that?

25 A. It is my nephew.



15:00:45 1 Q. Okay. Is he kin to Appala Rajanna?  
2 MS. SATAGAJ: Objection, form.  
3 A. What is that?  
4 Q. (By Mr. Freeman) Is he kin to Appala Rajanna?  
5 A. What do you mean?  
6 Q. Mr. Santhosh, your nephew.  
7 A. No.  
8 Q. Okay.  
9 A. It's my nephew.  
10 Q. And he was a witness?  
11 A. Yes.  
12 Q. And why was he a witness?  
13 MS. SATAGAJ: Objection, form.  
14 A. For any document to execute, like you need a  
15:01:12 15 witnesses, so he was one of the witness.  
16 Q. (By Mr. Freeman) Okay. Is -- Rajanna Appala  
17 is -- is he your relative?  
18 MS. SATAGAJ: Objection, form.  
19 A. No.  
20 Q. (By Mr. Freeman) Okay. He's not your cousin?  
21 A. No.  
22 Q. Was he at your wedding ceremony with Deepa?  
23 MS. SATAGAJ: Objection, form.  
24 A. I don't remember.  
25 Q. (By Mr. Freeman) You don't remember?

15:01:32 1 A. I don't remember. It's been 15 years, 16  
2 years.

3 Q. All right. Just please think back. Do -- do  
4 you remember Mr. Rajanna being at your wedding?

5 MS. SATAGAJ: Objection, form.

6 A. I don't remember.

7 Q. (By Mr. Freeman) Do you think that's  
8 possible?

9 A. It could be possible, but I don't remember.  
10 So many people came for my wedding, so --

11 Q. Why could it be possible?

12 MS. SATAGAJ: Objection, form.

13 A. I don't -- I -- I -- I don't remember. I  
14 mean, he's from my same village, so --

15:02:00 15 Q. (By Mr. Freeman) Okay. That's pretty much  
16 the only reason?

17 A. Yeah.

18 Q. Would you look at Exhibit 21, sir?

19 A. Yes.

20 Q. All right. Do you recognize that picture?

21 A. Yes. It looks like my wedding.

22 Q. Okay. And this was your wedding with Deepa?

23 A. Yes, I think so.

24 Q. Is -- the individual circled -- circled  
25 there, is that Appala Rajanna?

15:02:26 1 A. Yes.

2 Q. Okay. Is that the same Appala Rajanna who  
3 purchased the property we were just discussing?

4 MS. SATAGAJ: Objection, form.

5 A. Yes.

6 Q. (By Mr. Freeman) Okay. So was Mr. Rajanna,  
7 in fact, at your wedding?

8 MS. SATAGAJ: Objection, form.

9 A. Yes.

10 Q. (By Mr. Freeman) Okay. Was he actually your  
11 best man?

12 A. No.

13 MS. SATAGAJ: Objection, form.

14 Q. (By Mr. Freeman) No?

15:02:47 15 Did he have any role in the wedding?

16 MS. SATAGAJ: Objection --

17 A. No.

18 Q. (By Mr. Freeman) Okay.

19 A. I don't remember. It's like 16 years, so --

20 Q. Okay.

21 A. Yeah.

22 Q. So, Mr. Chintam, I'm going to ask you to  
23 watch this video, which will be Exhibit 22.

24 A. Okay.

25 (video was played.)

15:03:32 1 Q. (By Mr. Freeman) Okay. Do you recognize  
2 that, sir?

3 A. Yeah. It looks like that's from my wedding.

4 Q. A video from your wedding?

5 A. Yeah.

6 Q. And that's you and Deepa, right?

7 A. Yes.

8 Q. And is that Appala Rajanna giving you a  
9 drink?

10 A. Yes.

11 Q. Is that the same guy from the picture I just  
12 showed you?

13 A. Yes.

14 Q. And this is the same guy who bought several  
15:03:51 15 properties from you?

16 A. Yes.

17 Q. Okay. He's, in fact, related to you, isn't  
18 he?

19 A. No, he's not --

20 MS. SATAGAJ: Objection, form.

21 A. He's not related to me.

22 Q. (By Mr. Freeman) Okay. Did you ever give a  
23 loan to Rajanna Appala?

24 A. I --

25 MS. SATAGAJ: Objection, form.

15:04:05 1 A. I don't remember.

2 Q. (By Mr. Freeman) Does he have a lot of money?

3 MS. SATAGAJ: Objection --

4 A. I don't know.

5 MS. SATAGAJ: -- form.

6 Q. (By Mr. Freeman) Yeah. Did you ever know?

7 A. I don't know.

8 Q. Okay. But he had enough money to purchase  
9 the property from you?

10 A. Yeah, he purchased the property.

11 Q. Okay. I mean, was -- was he ever poor? Was  
12 he rich?

13 MS. SATAGAJ: Objection, form.

14 A. I --

15:04:27 15 Q. (By Mr. Freeman) No idea?

16 A. No idea.

17 Q. No idea? You don't know anything about his  
18 financial --

19 A. No.

20 Q. -- situation?

21 Okay. What was this particular property  
22 used for?

23 MS. SATAGAJ: Objection, form.

24 A. It's an apartment for --

25 Q. (By Mr. Freeman) Okay.

15:04:45 1 A. -- for rental purpose, lease purpose.  
2 Q. For -- for rental?  
3 A. Yes.  
4 Q. Okay. Did you rent it out?  
5 MS. SATAGAJ: Objection, form.  
6 A. No. My dad used to do it --  
7 Q. (By Mr. Freeman) Okay.  
8 A. -- when we own it.  
9 Q. And let's be clear. Which property are you  
10 referring to?  
11 A. Miyapur, right?  
12 Q. Miya- --  
13 A. You're talking about Miyapur, right?  
14 Q. Okay.  
15:05:03 15 A. Yeah.  
16 Q. What did you buy it for?  
17 MS. SATAGAJ: Objection, form.  
18 A. Why did you buy it from?  
19 Q. (By Mr. Freeman) Yes, for.  
20 A. I don't understand.  
21 Q. What was the purpose for buying it? Was it  
22 to develop an apartment?  
23 MS. SATAGAJ: Objection, form.  
24 A. Yes.  
25 Q. (By Mr. Freeman) And you did that, correct?

15:05:20 1 A. Yes.

2 Q. Okay. Did anyone assist you with that  
3 process?

4 MS. SATAGAJ: Objection, form.

5 A. I don't remember.

6 Q. (By Mr. Freeman) Okay. And you don't know  
7 where the fun- -- funds came from, do you?

8 MS. SATAGAJ: Objection, form.

9 A. I don't remember, yeah.

10 Q. (By Mr. Freeman) Okay. I'll ask you to turn  
11 to Exhibit 25, sir.

12 A. Okay.

13 Q. Okay. Do you recognize this document?

14 A. I've not seen it.

15:05:48 15 Q. You've never seen this --

16 A. No.

17 Q. -- document?

18 A. Huh-uh.

19 Q. Okay. Does it state that it's a lease  
20 agreement?

21 A. Yes.

22 Q. And is this a lease for the Miyapur property?

23 A. Yeah, looks like.

24 Q. Okay. And when is it dated?

25 A. Dated 1st day of March, 2015.

15:06:08 1 Q. So were you collecting rent from this  
2 property at that time?

3 MS. SATAGAJ: Objection, form.

4 A. I don't remember. I was -- my -- my dad used  
5 to handle it, so --

6 Q. (By Mr. Freeman) You dad did?

7 Okay. So you didn't handle any of the  
8 money?

9 A. No.

10 Q. And you have no idea how much money was  
11 received?

12 A. No.

13 Q. And where -- what did your dad do with that  
14 money?

15:06:29 15 MS. SATAGAJ: Objection, form.

16 A. I don't know.

17 Q. (By Mr. Freeman) Okay. But this was -- this  
18 is related to the apartment at Miyapur?

19 A. Yes.

20 MS. SATAGAJ: Objection, form.

21 Q. (By Mr. Freeman) Okay. The apartment that  
22 you ultimately sold?

23 MS. SATAGAJ: Objection --

24 A. Yes.

25 MS. SATAGAJ: -- form.



15:06:41 1 Q. (By Mr. Freeman) Okay. Did you ever own  
2 property in -- in Mu- -- Mubarak Nagar?

3 A. Yes. That was another -- that was another  
4 property she's claiming.

5 Q. Okay. And you're certain that you owned  
6 property there?

7 A. I owned it before, not anymore.

8 Q. Okay. But at one point in time --

9 A. Yes.

10 Q. -- you did?

11 A. Yes.

12 Q. Okay. Would you please turn to Exhibit 7,  
13 sir?

14 A. Exhibit 7, sure.

15:07:11 15 Q. Okay. Have you seen this document before?

16 A. One second. Give me a second, please.

17 Q. Sure.

18 A. Exhibit -- yeah. Yeah, I am looking, just  
19 one second. Yes, I am see that.

20 Q. Okay. And you see it?

21 A. Yes.

22 Q. Okay. And you've seen this document before,  
23 correct?

24 A. I mean, yeah. Not this one, but I have the  
25 Encumbrance Certificate.

15:07:42 1 Q. And is this, in fact, an Encumbrance  
2 Certificate?

3 A. Yes.

4 Q. Okay. It's an Encumbrance Certificate for  
5 the Mubarak Nagar property at issue in this case?

6 A. I -- I -- it's not visible properly, but  
7 that -- so, yeah, I think I did Mubarak Nagar.

8 Q. Is that right?

9 A. Yes.

10 Q. Okay. So that's what this represents,  
11 correct?

12 A. Yes.

13 Q. And is it dated April 2nd, 2019?

14 A. Yes.

15:08:14 15 Q. Okay. On Page 1, does your name appear  
16 there?

17 A. Yes.

18 Q. Okay. And it appears a couple of times,  
19 correct? Maybe on the --

20 A. Yeah. A couple of times, yes.

21 Q. Maybe three times --

22 A. Uh-huh.

23 Q. -- it looks like?

24 Okay. On -- on -- does it show you as  
25 the purchaser in April of 2014?

15:08:40 1 A. Yes.

2 Q. Okay. And is that, in fact, when you -- when  
3 you bought this property originally?

4 A. Yes.

5 Q. Okay. And above that, does it show you  
6 transferring the property to Boddu Sayanna?

7 A. Yes.

8 Q. Okay. And did you, in fact, transfer the  
9 property to Boddu Sayanna?

10 A. I sold it.

11 Q. Okay. You sold it to Mr. Sayanna?

12 A. Yes.

13 Q. And the date reflected in -- in this  
14 government document says 3 --

15:09:06 15 A. 30/03/2017.

16 Q. So is that March 30, 2017?

17 A. Yes.

18 Q. Okay. So is that the date that you sold this  
19 property to Mr. Sayanna?

20 MS. SATAGAJ: Objection, form.

21 A. Yes. Looks like, yeah.

22 Q. (By Mr. Freeman) Okay. And is that your  
23 recollection that you sold this property to --

24 A. Yes.

25 Q. -- Mr. Sayanna --

15:09:23 1 A. Yes.

2 Q. -- in March 30, 2017?

3 A. Yes.

4 Q. Okay. Is there a particular reason that you  
5 transferred this property and the Miyapur property in  
6 the same month?

7 A. There is no particular reason. They  
8 were under -- they are contract -- they were under  
9 contract in 2016, so, yeah, there's no particular  
10 reason, yea.

11 Q. Okay. Does this document show you  
12 transferring this property after the divorce?

13 MS. SATAGAJ: Objection, form.

14 A. No, it's not after the divorce. My divorce  
15:09:58 15 happened on August 1, 2017.

16 Q. (By Mr. Freeman) Okay.

17 A. And this is March 30, 2017.

18 Q. Does it show you transferring this property  
19 after filing for divorce?

20 A. Yes, it shows. But the contract was in 2016,  
21 so --

22 Q. Okay. But you transferred title to this  
23 property after filing for divorce?

24 A. Yes. Official document, yes.

25 Q. Did you request permission from the Court?

15:10:19 1 MS. SATAGAJ: Objection, form.  
2 A. It was already under contract, so -- in 2016,  
3 it was already under contract, so --  
4 Q. (By Mr. Freeman) Did you alert the Court to  
5 the transfer?  
6 MS. SATAGAJ: Objection, form.  
7 A. It was -- it was not -- it -- it was not  
8 (indiscernible) as a standing order, so -- because it  
9 was already under contract --  
10 Q. Okay.  
11 A. -- so I had to execute, so --  
12 Q. Okay.  
13 A. Yeah.  
14 Q. Did you take any steps to notify Deepa at  
15:10:43 15 that time of transfer?  
16 A. I --  
17 MS. SATAGAJ: Objection, form.  
18 A. -- don't remember.  
19 Q. (By Mr. Freeman) Okay.  
20 A. Yeah.  
21 Q. Did you send an email or --  
22 MS. SATAGAJ: Objection, form.  
23 A. I don't remember.  
24 Q. (By Mr. Freeman) Okay. If you will, sir,  
25 look to Exhibit 16.

15:11:00 1 A. Exhibit 15 [sic] -- yeah.  
2 Q. Okay. Sir, do you recognize this document?  
3 A. No, this looks like a sale deed.  
4 Q. Okay. Is that what it is?  
5 A. Yes.  
6 Q. Okay. Has -- have you seen this before?  
7 A. We -- I think we gave this in the mediation  
8 to --  
9 Q. You think so?  
10 A. I recall, yeah.  
11 Q. Okay.  
12 A. No, this is -- yeah, this is (inaudible).  
13 Q. What documentation do you have to -- to show  
14 me that you produced this in the mediation?  
15:11:42 15 MS. SATAGAJ: Objection, form.  
16 A. Produced in the mediation?  
17 Q. (By Mr. Freeman) Uh-huh.  
18 A. They will have the inventory appraisement  
19 list.  
20 Q. Okay.  
21 A. Yeah.  
22 Q. Did you produce this document at any time  
23 prior to the mediation?  
24 MS. SATAGAJ: Objection, form.  
25 A. I don't remember.

15:11:55 1 Q. (By Mr. Freeman) Okay. Did you produce it in  
2 response any discovery requests?

3 A. I --

4 MS. SATAGAJ: Objection, form.

5 A. -- don't remember.

6 Q. (By Mr. Freeman) Okay. What property is this  
7 Exhibit 16 related to?

8 A. Mubarak Nagar.

9 Q. Mubarak Nagar?

10 A. Yes.

11 Q. Okay. And does it list Boddu Sayanna as the  
12 buyer?

13 A. Yes.

14 Q. Okay. And were there also witnesses to this  
15:12:18 15 deed?

16 A. Yeah. I cannot see. You let me --

17 Q. On the third page maybe?

18 A. Okay. Yeah.

19 Q. Okay. Is Appala Rajanna one of the witnesses  
20 listed there on Page 3?

21 A. Yes.

22 Q. Okay. Why was Mr. Rajanna a witness on this  
23 transaction?

24 MS. SATAGAJ: Objection, form.

25 A. He's from my same village, so --

15:12:40 1 Q. (By Mr. Freeman) Okay.

2 A. Yeah.

3 Q. Was he a friend of yours?

4 MS. SATAGAJ: Objection, form.

5 A. No. He's just from my village, so --

6 Q. (By Mr. Freeman) Okay. Why did he serve as a  
7 witness?

8 MS. SATAGAJ: Objection, form.

9 A. When you're buying something, you need  
10 somebody to be a witness, so --

11 Q. (By Mr. Freeman) Was there any connection  
12 between him and Boddu Sayanna?

13 A. No.

14 MS. SATAGAJ: Objection, form.

15:13:03 15 Q. (By Mr. Freeman) They didn't know each other  
16 prior to this?

17 A. I don't know.

18 MS. SATAGAJ: Objection, form.

19 Q. (By Mr. Freeman) Okay. Did they appear to  
20 know each other when they witnessed this document?

21 A. I don't know.

22 MS. SATAGAJ: Objection, form.

23 Q. (By Mr. Freeman) Could you tell from their  
24 interactions?

25 MS. SATAGAJ: Objection, form.



15:13:13 1 A. I don't remember.

2 Q. (By Mr. Freeman) Okay. Is this the same  
3 Appala Rajanna who was in your wedding?

4 MS. SATAGAJ: Objection, form.

5 A. Yes.

6 Q. (By Mr. Freeman) Okay. Is Boddu Sayanna a  
7 friend of yours?

8 MS. SATAGAJ: Objection, form.

9 A. No.

10 Q. (By Mr. Freeman) Did you introduce him to  
11 Sandeep Adema?

12 MS. SATAGAJ: Objection, form.

13 A. I don't remember.

14 Q. (By Mr. Freeman) Did you introduce him as a  
15:13:33 15 family friend?

16 MS. SATAGAJ: Objection, form.

17 A. No. I don't remember.

18 Q. (By Mr. Freeman) Was he also at your wedding?

19 MS. SATAGAJ: Objection, form.

20 A. I don't remember.

21 Q. (By Mr. Freeman) You don't remember?

22 Do you have any pictures of y'all  
23 together?

24 MS. SATAGAJ: Objection, form.

25 A. No, I don't.

15:13:44 1 Q. (By Mr. Freeman) Any pictures of any other  
2 family members with Boddu Sayanna?

3 MS. SATAGAJ: Objection, form.

4 A. No.

5 Q. (By Mr. Freeman) Okay. So you really  
6 didn't -- didn't know Boddu Sayanna very well?

7 MS. SATAGAJ: Objection, form.

8 A. No, I don't have anything, yeah.

9 Q. (By Mr. Freeman) And you don't think he was  
10 at your wedding?

11 A. I don't know.

12 Q. Okay. Would there have been any reason he  
13 would have been at your wedding?

14 A. I don't remember. It's been 16 years.

15:14:05 15 Q. Okay. Who is Gandi Sridimar [sic]?

16 A. I don't know.

17 Q. Okay. On Exhibit 16, you don't know who that  
18 is, the name --

19 A. No.

20 Q. -- that's listed there?

21 A. No.

22 Q. Okay. With respect to this property  
23 reflected in Exhibit 16, why had you purchased this  
24 property originally?

25 MS. SATAGAJ: Objection, form.

15:14:47 1 A. I -- I am just -- I -- I mean, I buy  
2 properties, and I do sometimes real estate, so that's  
3 why I did.

4 Q. (By Mr. Freeman) Okay.

5 A. So that's how I bought all the properties  
6 here and which were awarded to Deepa.

7 Q. Okay.

8 A. So --

9 Q. It's just -- did you -- did you develop it?

10 MS. SATAGAJ: Objection, form.

11 A. No.

12 Q. (By Mr. Freeman) No?

13 Did you -- did you lease it?

14 MS. SATAGAJ: Objection --

15:15:08 15 A. No.

16 MS. SATAGAJ: -- form.

17 Q. (By Mr. Freeman) Did you invest any further  
18 in it?

19 A. No.

20 MS. SATAGAJ: Objection, form.

21 Q. (By Mr. Freeman) Did you market it?

22 MS. SATAGAJ: Objection, form.

23 A. No.

24 Q. (By Mr. Freeman) Okay. Did it just sit  
25 there?

15:15:20 1 MS. SATAGAJ: Objection, form.  
2 A. Yes.  
3 Q. (By Mr. Freeman) Okay. What -- how did you  
4 purchase it?  
5 MS. SATAGAJ: Objection, form.  
6 A. I don't remember. It's been a long time.  
7 Q. (By Mr. Freeman) Okay. You don't know if it  
8 was with cash?  
9 A. No --  
10 MS. SATAGAJ: Objection, form.  
11 A. -- I don't remember, yeah.  
12 Q. (By Mr. Freeman) Okay. Do you know if it was  
13 by check?  
14 MS. SATAGAJ: Objection, form.  
15:15:35 15 A. I don't remember.  
16 Q. (By Mr. Freeman) Okay. Were there any  
17 documents in the process of purchasing this docu- --  
18 this property?  
19 MS. SATAGAJ: Objection, form.  
20 A. I don't have it.  
21 Q. (By Mr. Freeman) Okay. Have you done  
22 anything to search for any documents related to this  
23 property?  
24 A. No.  
25 Q. Have you searched your emails for any

15:15:56 1 documents related to this property?

2 MS. SATAGAJ: Objection, form.

3 A. No. I gave my attorney the documents, what I  
4 have, so --

5 Q. (By Mr. Freeman) Okay. Just that's the  
6 Encumbrance Certificate --

7 A. Yes.

8 Q. -- from the government?

9 A. Yes. Even the same document we gave in -- on  
10 the mediation settlement day to Deepa.

11 Q. Okay.

12 A. This exact document.

13 Q. Okay.

14 A. So she had it that day.

15:16:16 15 Q. Okay.

16 A. So this was disclosed.

17 Q. I appreciate it. So --

18 A. Thank you.

19 Q. -- in -- in this case, did you do anything  
20 to, you know -- I understand you've -- you -- you  
21 maintain you've transferred this property, and -- and  
22 so you don't feel much obligation to do anything with  
23 the property, but did you do -- did you conduct any  
24 kind of search of your emails to see whether you had  
25 any email correspondence related to this property?

15:16:42 1 A. No.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) Did you conduct any kind of  
4 search of your emails to see whether you had any  
5 documents related to this property?

6 MS. SATAGAJ: Objection, form.

7 A. No.

8 Q. (By Mr. Freeman) Did you search your files at  
9 home to see whether you had any document related to  
10 this property?

11 MS. SATAGAJ: Objection --

12 A. No.

13 MS. SATAGAJ: -- Form.

14 Q. (By Mr. Freeman) Did you not believe you had  
15 any -- any need to look for that?

16 A. I --

17 MS. SATAGAJ: Objection, form.

18 A. I mean, I gave all the documentation to the  
19 buyer, so --

20 Q. (By Mr. Freeman) Okay. So, Mr. -- Mr.  
21 Chintam, I'm -- just so I'm understanding, you didn't  
22 really feel any need or obligation to look for  
23 anything else related --

24 A. I --

25 Q. -- to the property?

15:17:20 1 MS. SATAGAJ: Objection --

2 A. Okay.

3 MS. SATAGAJ: -- form.

4 A. Okay.

5 Q. (By Mr. Freeman) Please answer the question.

6 A. No.

7 Q. Okay. Thank you, sir.

8 A. You're welcome.

9 Q. When you hear the words "objection, form,"

10 does that indicate to you that you should answer in

11 any particular way?

12 A. No.

13 Q. Okay. Where did the funds come from to

14 purchase this property?

15:17:54 15 MS. SATAGAJ: Objection, form.

16 A. I don't remember.

17 Q. (By Mr. Freeman) Okay. Were you physically

18 there to purchase this property?

19 MS. SATAGAJ: Objection --

20 A. I --

21 MS. SATAGAJ: -- form.

22 A. -- don't remember.

23 Q. (By Mr. Freeman) Okay. Did anyone assist you

24 with purchasing the properties?

25 A. I don't --

15:18:05 1 MS. SATAGAJ: Objection, form.  
2 A. -- remember.  
3 Q. (By Mr. Freeman) Did anyone assist you with  
4 selling this property?  
5 MS. SATAGAJ: Objection, form.  
6 A. I don't remember.  
7 Q. (By Mr. Freeman) Do you know if you received  
8 any funds for selling this property?  
9 MS. SATAGAJ: Objection, form.  
10 A. Yes.  
11 Q. (By Mr. Freeman) You did?  
12 A. Yes.  
13 Q. Okay. How much?  
14 A. I don't remember. It should be part of  
15:18:25 15 the -- the mediated settlement agreement we gave and  
16 produced.  
17 Q. Okay.  
18 A. And I don't know the numbers.  
19 Q. Okay. Do you have any idea how much it was?  
20 A. No.  
21 Q. Did you know how much this property was  
22 worth?  
23 A. No.  
24 Q. Okay. What form did you receive the -- that  
25 money in?



15:18:39 1 A. I don't remember.  
2 Q. Do you know --  
3 A. It's been a long time.  
4 Q. -- what you did with it?  
5 A. What is it?  
6 Q. Do you know what you did with that property?  
7 A. Yeah. I invested in the business, fish and  
8 chicken business.  
9 Q. You invested in a fish and chicken business?  
10 A. Yes.  
11 Q. Okay. And am I correct you invested only  
12 cash in that --  
13 A. Yes.  
14 Q. -- fish and chicken business?  
15:19:00 15 A. Yes.  
16 Q. Okay. And did anyone assist you with that  
17 process?  
18 MS. SATAGAJ: Objection, form.  
19 A. I don't remember, no.  
20 Q. (By Mr. Freeman) Okay. Did you ever own any  
21 property in Bongloor?  
22 A. Bongloor? Yes.  
23 Q. Yes, sir.  
24 A. Yes.  
25 Q. Okay. And is that the Bongloor property at

15:19:21 1 issue in this case?

2 A. Yes.

3 Q. Okay. If you will, sir, look to Exhibit 5.

4 A. Yes.

5 Q. Okay. Do you recognize that document, sir?

6 A. Yeah. This is Encumbrance Certificate.

7 Q. Okay. And is that an Encumbrance Certificate  
8 with the respect to the Bongloor property?

9 A. Yes.

10 Q. Okay. Is it dated March 22nd, 2019?

11 A. The search date, March 22, 2019, yes.

12 Q. And just a bit below that, does it say

13 Sri/Smt. A. Sandeep Kumar?

14 A. Yes.

15:20:06 15 Q. Okay. And does it go on to say "Having  
16 searched for a statement giving particulars of  
17 registered acts and encumbrances;" is that --

18 A. Yes.

19 Q. -- correct?

20 A. Yes.

21 Q. Okay. Do you take this to mean that Sandeep  
22 Kumar requested this Statement of Encumbrance?

23 MS. SATAGAJ: Objection, form.

24 A. I don't know.

25 Q. (By Mr. Freeman) You don't know what that

15:20:23 1 means?

2 A. Yeah.

3 Q. Okay. Do you currently own this property?

4 A. No.

5 Q. Okay. Did you ever transfer this property?

6 A. I sold the property.

7 Q. Okay. So you did own it at one time?

8 A. Yes.

9 Q. Okay. And looking on Page 1, does your name  
10 appear there?

11 A. Yes.

12 Q. Okay. And is that the second line, 2 of 3?

13 A. Second line, yeah.

14 Q. Okay. And does -- Line 2 of 3, does that  
15:20:51 15 reflect your purchase of the property?

16 A. Yes.

17 Q. Is that in December of 2006?

18 A. Yes.

19 Q. Okay. And above that, does it show you  
20 transferring the property to Rajanna Appala?

21 A. Yes. Sold the property, yeah.

22 Q. Okay. And is that the same Rajanna Appala  
23 that we previously discussed?

24 A. Yes.

25 MS. SATAGAJ: Objection, form.

15:21:10 1 Q. (By Mr. Freeman) The same Rajanna Appala that  
2 was in your wedding?

3 MS. SATAGAJ: Objection, form.

4 A. Yes.

5 Q. (By Mr. Freeman) Okay. So did he purchase --  
6 does this reflect that he purchased a second property  
7 from you?

8 MS. SATAGAJ: Objection --

9 A. Yes.

10 MS. SATAGAJ: -- form.

11 Q. (By Mr. Freeman) Okay. The date of this  
12 transfer reflected here, is that April 26, 2017?

13 A. Yes.

14 Q. Okay. And is that, in fact, the date that  
15:21:32 15 you transferred this property?

16 A. Yeah. It was under contract in 2016.

17 Q. Okay. But you actually transferred title to  
18 the Bongloor property in -- on April 26, 2017?

19 A. Yes.

20 Q. And you executed a -- a deed transferring  
21 that title on -- on April 26, 2017?

22 A. Yes.

23 Q. Okay. And that was transferred to your -- to  
24 Rajanna Appala, correct?

25 A. Yes.

15:21:59 1 Q. And he was in your wedding?  
2 MS. SATAGAJ: Objection, form.  
3 A. Yes.  
4 Q. (By Mr. Freeman) Okay. And when you -- when  
5 you made that transfer, did you receive any money?  
6 A. I'm sure I -- I did.  
7 Q. Okay. How much money did you receive?  
8 A. I don't remember.  
9 Q. Okay. Can you give me any estimate?  
10 A. No, I don't remember.  
11 Q. What do you believe this property was worth?  
12 A. I don't know.  
13 Q. No idea? I mean, you -- not --  
14 A. I -- we produced it. I don't remember. All  
15:22:30 15 this is produced in mediation settlement agreement,  
16 and Deepa got everything, so --  
17 Q. Okay. So Deepa got this property?  
18 A. No, no, no. I mean, so Deepa got the -- the  
19 division of the property.  
20 Q. Oh, she got -- you divided this property?  
21 A. No.  
22 Q. Okay.  
23 A. The -- the value.  
24 Q. Was this property available to divide at the  
25 time of divorce?

15:22:54 1 A. No.

2 MS. SATAGAJ: Objection.

3 Q. (By Mr. Freeman) Okay. So it wasn't  
4 available to be divided?

5 A. No.

6 Q. Okay.

7 A. But the -- the -- the proceeds were divided.

8 Q. But you knew that then; is that correct?

9 A. The -- the --

10 THE REPORTER: One at a time.

11 Q. (By Mr. Freeman) You knew that then, right?

12 A. The proceeds were divided.

13 Q. Okay. But you believed at the time of  
14 divorce this property was not available to divide,  
15:23:09 15 correct?

16 A. Yeah. The money we got from the property was  
17 divided.

18 Q. Okay. And you transferred this property --  
19 you transferred title to this property after February  
20 7th, 2017; is that correct?

21 A. Yes.

22 Q. Okay. That's after you filed for divorce?

23 A. Yes. But it was under contract in 2016.

24 Q. Okay. What was this property used for?

25 MS. SATAGAJ: Objection, form.

15:23:33 1 A. Just a piece of land.

2 Q. (By Mr. Freeman) Okay. Did you -- did you do  
3 anything with it?

4 A. No.

5 MS. SATAGAJ: Objection, form.

6 Q. (By Mr. Freeman) Did you invest in it?

7 MS. SATAGAJ: Objection --

8 A. No.

9 MS. SATAGAJ: -- form.

10 Q. (By Mr. Freeman) Did you lease it?

11 MS. SATAGAJ: Objection, form.

12 A. No.

13 Q. (By Mr. Freeman) No?

14 Did you use it as security in any kind of  
15 agreement?

15:23:46

16 MS. SATAGAJ: Objection --

17 A. No.

18 MS. SATAGAJ: -- form.

19 Q. (By Mr. Freeman) Did you have anyone manage  
20 it?

21 MS. SATAGAJ: Objection, form.

22 A. No.

23 Q. (By Mr. Freeman) How many times did you go  
24 out to see this property?

25 MS. SATAGAJ: Objection, form.

15:23:55 1 A. I don't remember.

2 Q. (By Mr. Freeman) Okay. Did you ever go out  
3 to see it?

4 MS. SATAGAJ: Objection, form.

5 A. I don't remember.

6 Q. (By Mr. Freeman) Okay. How did you obtain  
7 the funds to purchase this property?

8 MS. SATAGAJ: Objection, form.

9 A. I don't remember.

10 Q. (By Mr. Freeman) You don't remember?

11 A. Huh-uh.

12 Q. And you don't remember what you received when  
13 you transferred this property?

14 A. It's declared in the mediation -- mediation  
15:24:17 15 and inventory appraisalment, so we should look at the  
16 documents.

17 Q. Okay. Have you declared that in your  
18 discovery responses in this case?

19 A. In this case?

20 Q. Yes, sir.

21 A. I gave everything to my attorney, so --

22 Q. Okay.

23 A. Yeah.

24 Q. But you maintain you -- you received money  
25 for transferring this property?



15:24:33 1 A. Yes.

2 Q. You just don't know how much?

3 A. That's correct.

4 Q. And you don't know whether it was cash?

5 A. I don't remember.

6 Q. You don't remember if it was a check?

7 MS. SATAGAJ: Objection, form.

8 A. No, I don't remember.

9 Q. (By Mr. Freeman) You don't remember if you

10 deposited into a bank account?

11 MS. SATAGAJ: Objection, form.

12 A. I don't know.

13 Q. (By Mr. Freeman) You don't know what you did

14 with that money?

15:24:48 15 MS. SATAGAJ: Objection.

16 A. I don't remember, yeah.

17 Q. (By Mr. Freeman) Okay. So as we sit here

18 today, there's no telling what happened to that money?

19 MS. SATAGAJ: Objection, form.

20 A. I don't remember.

21 Q. (By Mr. Freeman) Okay. How much did you

22 think this property was worth?

23 A. I don't remember. We -- we sold it, and we

24 gave that information, so --

25 Q. Okay.

15:25:01 1 A. -- I don't remember. Yeah, it was more  
2 like --  
3 Q. We're talking about the Bongloor property --  
4 A. Yes.  
5 Q. -- correct?  
6 A. Yes.  
7 Q. All this?  
8 Okay. Did anyone assist you with the --  
9 with the sale of this property?  
10 MS. SATAGAJ: Objection, form.  
11 A. I don't remember.  
12 Q. (By Mr. Freeman) Were there any documents  
13 related to the sale of this property?  
14 A. We produced it already.  
15:25:19 15 Q. Okay. I mean, was there a contract for the  
16 sale of this property?  
17 A. I don't remember.  
18 Q. Okay. Was there a deed for the sale of this  
19 property?  
20 A. I don't remember.  
21 Q. Were there any other documents you might have  
22 had to execute for the sale of this property?  
23 A. There was a sale deed like any other  
24 property, so --  
25 Q. Okay. Is there anything else you can tell me

15:25:38 1 about this property?

2 A. Nothing. Same like any other property, so --

3 Q. Okay. So as -- we've just gone through  
4 several documents. These documents demonstrate that  
5 you transferred three properties during the divorce?

6 MS. SATAGAJ: Objection, form.

7 A. Yes. They were all under contract before  
8 even divorce was filed, so --

9 Q. (By Mr. Freeman) Right.

10 Did you anticipate a divorce from Deepa  
11 before you filed for it?

12 A. No.

13 Q. So you just -- what happened that made you  
14 decide to file for divorce?

15:26:16 15 MS. SATAGAJ: Objection, form.

16 A. She wanted a divorce, not me.

17 Q. Okay.

18 A. So --

19 Q. So you didn't, you know -- 2016, you  
20 didn't --

21 A. No.

22 Q. -- have any reason to believe you would --

23 A. No.

24 Q. -- file for divorce?

25 A. We -- we -- we bought the property in

15:26:32 1 October, November 2016 here.

2 Q. Okay.

3 A. So if I was planning my divorce, I would not  
4 be buying other property here --

5 Q. Okay.

6 A. -- which was -- which was awarded to her.

7 Q. Okay.

8 A. So she's the one who wanted the divorce --

9 Q. Okay.

10 A. -- not me.

11 Q. Was that just kind of a spur of the moment  
12 thing, or had y'all been talking about it before?

13 MS. SATAGAJ: Objection, form.

14 A. I don't know what -- minds, I cannot read.

15:26:55 15 Q. (By Mr. Freeman) Okay. Who is Bhupal Singh?

16 MS. SATAGAJ: Objection, form.

17 A. He's -- he's my friend.

18 Q. (By Mr. Freeman) Okay. How do you know him?

19 MS. SATAGAJ: Objection, form.

20 A. From my college.

21 Q. (By Mr. Freeman) Okay. Do you work with him?

22 A. No.

23 MS. SATAGAJ: Objection, form.

24 Q. (By Mr. Freeman) No?

25 Does he help you with anything in India?

15:27:13 1 MS. SATAGAJ: Objection --  
2 A. No.  
3 MS. SATAGAJ: -- form.  
4 Q. (By Mr. Freeman) Has he ever helped you with  
5 anything in India?  
6 MS. SATAGAJ: Objection, form.  
7 A. I don't remember.  
8 Q. (By Mr. Freeman) I mean, what is the extent  
9 of your relationship with -- with him?  
10 MS. SATAGAJ: Objection, form.  
11 A. He's just a friend like anybody else.  
12 Q. (By Mr. Freeman) Okay.  
13 A. College, yeah.  
14 Q. Okay. Would you look at Exhibit 23, please,  
15:27:32 15 sir?  
16 A. No -- yes.  
17 Q. Do you recognize this email?  
18 A. This is 2010. I have no idea.  
19 Q. Okay. Who is Gur- -- Gurunath Perla?  
20 A. I don't know.  
21 Q. You don't know?  
22 A. I have no idea, yeah.  
23 Q. But he's on emails with you?  
24 A. Yeah, I don't remember. I have no idea.  
25 Q. Okay. Is that your -- your email reflected

15:28:02 1 in Exhibit 23? If you look about -- almost halfway  
2 down, it says, "Hello. Gurunath, it was nice speaking  
3 to you. I trust two people in India."

4 Is that correct?

5 A. Uh-huh.

6 Q. Okay. And then you go on to say, "Sandeep  
7 Kumar;" is that correct?

8 A. Uh-huh.

9 Q. And Bupal?

10 A. Yeah.

11 Q. Okay. And does -- does it look like Gurunath  
12 Perla works in the real estate industry looking at  
13 this email?

14 MS. SATAGAJ: Objection, form.

15:28:32 15 A. Yeah, I mean, looks like. It's been a long  
16 time. I have no idea --

17 Q. (By Mr. Freeman) Okay.

18 A. -- so what happened. I cannot recollect.

19 Q. Take a look at this email. Is this regarding  
20 the purchase of some properties in India?

21 MS. SATAGAJ: Objection, form.

22 A. Yeah. I -- I don't remember, yeah.

23 Q. (By Mr. Freeman) Okay.

24 A. This, I have no recollection.

25 Q. Why did you trust Bupal?

15:28:53 1 MS. SATAGAJ: Objection, form.  
2 A. He was just a friend, so --  
3 Q. (By Mr. Freeman) Okay. Why did you trust  
4 Sandeep Kumar?  
5 MS. SATAGAJ: Objection, form.  
6 A. It's -- it's just family -- ex-family.  
7 Q. (By Mr. Freeman) Okay. Was he -- was Bupal  
8 buying properties for you in India?  
9 MS. SATAGAJ: Objection, form.  
10 A. I don't remember. I don't think so.  
11 Q. (By Mr. Freeman) No?  
12 And was Sandeep Kumar buying properties  
13 for you as well?  
14 A. No.  
15:29:17 15 MS. SATAGAJ: Objection, form.  
16 A. I don't remember.  
17 Q. (By Mr. Freeman) Sandeep Kumar never helped  
18 you purchase any properties in India?  
19 A. I don't --  
20 MS. SATAGAJ: Objection --  
21 A. -- remember.  
22 MS. SATAGAJ: -- form.  
23 Q. (By Mr. Freeman) Okay. And Bupal never  
24 helped you?  
25 A. I don't --

15:29:27 1 Q. -- purchase any properties in India?  
2 A. I don't remember.  
3 MS. SATAGAJ: Objection, form.  
4 Q. (By Mr. Freeman) Okay. Does Bupal own any  
5 property in India?  
6 A. I don't know.  
7 Q. Did he ever have ownership in any of the  
8 properties we've discussed?  
9 MS. SATAGAJ: Objection, form.  
10 A. I don't know.  
11 Q. (By Mr. Freeman) You don't know --  
12 A. I don't know.  
13 Q. -- if he ever owned any of the properties you  
14 owned?  
15:29:45 15 A. I don't know.  
16 Q. Does he currently own any of these  
17 properties?  
18 MS. SATAGAJ: Objection, form.  
19 A. I don't know.  
20 Q. (By Mr. Freeman) Did you ever give money to  
21 Bupal?  
22 MS. SATAGAJ: Objection, form.  
23 A. No.  
24 Q. (By Mr. Freeman) No?  
25 Did he ever give you money?



15:29:58 1 A. No.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) Money from selling  
4 properties?

5 MS. SATAGAJ: Objection, form.

6 A. No.

7 Q. (By Mr. Freeman) Okay.

8 A. I -- yeah, nothing.

9 Q. So you maintain that you disclosed the  
10 properties at issue here to Deepa?

11 A. Yes. All the properties were disclosed --

12 Q. Okay.

13 A. -- during the divorce, yeah.

14 Q. What do you mean by that? Did you tell her  
15:30:16 15 then that you didn't own them?

16 A. Yes. We --

17 Q. Is that what you said?

18 A. They were -- they were sold and all the money  
19 was settled --

20 Q. Okay.

21 A. -- during the mediation settlement date.

22 Q. So you told her during the divorce that you  
23 didn't own these properties?

24 A. Yeah.

25 Q. Is that what you're telling me?

15:30:30 1 A. I -- I communicated to my attorney, yes.

2 Q. Okay. What -- what specifically did you say?

3 MS. SATAGAJ: Objection --

4 A. No. I -- the --

5 MS. SATAGAJ: -- form. It invades  
6 attorney-client privilege.

7 Q. (By Mr. Freeman) Not to your attorney.

8 What -- what was conveyed to Deepa?

9 A. I don't remember, man. It's been five years  
10 now, so --

11 Q. Okay. And had you ever disclosed these  
12 properties during discovery in the divorce?

13 MS. SATAGAJ: Objection, form.

14 A. I don't remember.

15:31:03 15 Q. (By Mr. Freeman) No?

16 Have you produced any evidence of having  
17 done that in this case?

18 MS. SATAGAJ: Objection, form.

19 A. Can you please repeat?

20 Q. (By Mr. Freeman) In this case, have you  
21 produced any evidence that you've disclosed these  
22 properties during discovery during the divorce?

23 A. I mean, I --

24 MS. SATAGAJ: Objection, form.

25 A. I gave all -- I gave everything, whatever I

15:31:23 1 have --

2 Q. (By Mr. Freeman) Okay.

3 A. -- like all this documentation.

4 Q. Okay. Do you have any documentation that  
5 demonstrates that you disclosed any of the properties  
6 we have discussed today during the divorce?

7 MS. SATAGAJ: Objection, form.

8 A. I -- I don't -- I don't remember, yeah.

9 Q. (By Mr. Freeman) Okay.

10 A. Yeah, I don't have it.

11 Q. You don't remember?

12 A. Yeah, I don't remember.

13 Q. And did Deepa request documents related to  
14 any Indian properties?

15:31:48 15 A. I don't --

16 MS. SATAGAJ: Objection --

17 A. -- remember.

18 MS. SATAGAJ: -- form.

19 Q. (By Mr. Freeman) Uh-huh. You don't remember  
20 if she asked for any documentation on any real  
21 property in India?

22 A. I --

23 MS. SATAGAJ: Objection --

24 A. -- don't remember.

25 MS. SATAGAJ: -- form.

15:31:57 1 Q. (By Mr. Freeman) During the divorce, you  
2 don't remember?

3 A. Uh-huh.

4 MS. SATAGAJ: Objection, form.

5 Q. (By Mr. Freeman) Okay. And you didn't  
6 provide any documents of these particular properties  
7 at issue during the divorce, did you?

8 MS. SATAGAJ: Objection, form.

9 A. We produced.

10 Q. (By Mr. Freeman) Okay.

11 A. Yeah, we produced the documents.

12 Q. What specifically did you produce?

13 A. I don't remember, but we produced it, all --  
14 for all the properties.

15:32:17 15 Q. Okay.

16 A. Yeah.

17 Q. At what point in time?

18 A. I don't remember.

19 Q. Okay. Were -- these properties, were they  
20 all bought during the marriage?

21 A. Yes.

22 Q. Where did the funds come from to purchase the  
23 properties?

24 MS. SATAGAJ: Objection, form.

25 A. I -- I don't remember, yeah.

15:32:39 1 Q. (By Mr. Freeman) Did you use any Indian bank  
2 accounts?

3 A. I don't -- I don't remember.

4 Q. Did you pull any cash from Indian bank  
5 accounts (overtalk)?

6 MS. SATAGAJ: Objection, form.

7 A. I don't remember.

8 Q. (By Mr. Freeman) Are there any legal  
9 restrictions on using cash to buy properties in  
10 India over --

11 MS. SATAGAJ: Objection, form.

12 Q. (By Mr. Freeman) -- over any dollar amount?

13 A. I don't know.

14 MS. SATAGAJ: Sorry. Objection, form.

15:32:57 15 Q. (By Mr. Freeman) You don't know?

16 A. I don't know.

17 Q. You've never -- have you ever heard that it  
18 is illegal to use cash to buy properties in India over  
19 threshold dollar amount?

20 MS. SATAGAJ: Objection, form.

21 A. I don't know.

22 Q. (By Mr. Freeman) Okay. Did you provide  
23 Sandeep Adema money to purchase property?

24 A. I --

25 MS. SATAGAJ: Objection, form.

15:33:21 1 A. I don't remember.

2 Q. (By Mr. Freeman) You don't remember or your  
3 didn't?

4 A. I don't remember.

5 Q. Okay. Does that seem like something you  
6 would remember?

7 A. No. I don't remember.

8 MS. SATAGAJ: Objection, form.

9 Q. (By Mr. Freeman) Okay. Did you, in fact,  
10 involve Sandeep Adema in the purchase of a number of  
11 these properties?

12 MS. SATAGAJ: Objection, form.

13 A. I don't remember.

14 Q. (By Mr. Freeman) You don't remember?

15:33:41 15 A. (No response.)

16 Q. Okay. Did you, in fact, involve him in the  
17 sale of any properties?

18 MS. SATAGAJ: Objection, form.

19 A. I don't remember.

20 Q. (By Mr. Freeman) Okay. So you don't know if  
21 Sandeep Adema has personal knowledge of these  
22 transactions?

23 A. I don't know.

24 MS. SATAGAJ: Objection, form.

25 Q. (By Mr. Freeman) Do you know if any of these

15:33:57 1 properties produce income for Rajanna Appala?

2 MS. SATAGAJ: Objection, form.

3 A. I don't know.

4 Q. (By Mr. Freeman) Do you know if any of them  
5 produce any income from Boddu Sayanna?

6 MS. SATAGAJ: Objection, form.

7 A. I don't know.

8 Q. (By Mr. Freeman) Have you traveled to India  
9 in the past three years?

10 MS. SATAGAJ: Objection, form.

11 A. I don't know.

12 Q. (By Mr. Freeman) Okay.

13 A. Yeah.

14 Q. If you did, did you visit any of these  
15:34:16 15 properties?

16 MS. SATAGAJ: Objection, form.

17 A. They were sold already, so there was no  
18 point --

19 Q. (By Mr. Freeman) Okay.

20 A. -- for visiting, yeah.

21 Q. And you don't know if you traveled to India  
22 in the last three years?

23 MS. SATAGAJ: Objection, form.

24 A. Well, yeah, I don't know exactly three years.  
25 But after COVID and all.

15:34:28 1 Q. (By Mr. Freeman) When is the last time you  
2 remember tra- -- traveling to India?

3 A. Maybe like 2018, yeah.

4 Q. Okay. Did you give money to Sandeep Adema  
5 while you were there?

6 MS. SATAGAJ: Objection --

7 A. I --

8 MS. SATAGAJ: -- form.

9 A. I don't know. I don't remember.

10 Q. No?

11 And did it come from your personal  
12 account?

13 MS. SATAGAJ: Objection, form.

14 A. I don't remember.

15:34:46 15 Q. (By Mr. Freeman) Did it come from Vectra  
16 Infosys?

17 A. I don't --

18 MS. SATAGAJ: Objection, form.

19 A. -- remember.

20 Q. (By Mr. Freeman) You don't remember?

21 A. Uh-huh.

22 Q. Why is it that you don't remember that?

23 A. I -- I mean --

24 MS. SATAGAJ: Objection, form.

25 Q. (By Mr. Freeman) You -- you can't give me a



15:34:56 1 yes or no? You just don't remember?

2 A. Yeah, I don't remember.

3 Q. You -- you don't remember whether you gave  
4 money to Sandeep Adema while you were in India?

5 A. I don't remember.

6 MS. SATAGAJ: Objection, form.

7 Q. (By Mr. Freeman) And you don't remember if  
8 you gave any money to Sandeep Adema that came from  
9 Vectra Infosys?

10 MS. SATAGAJ: Objection, form.

11 A. I don't remember.

12 Q. (By Mr. Freeman) Okay. And you don't  
13 remember if you gave any money to Sandeep Adema that  
14 came from your personal bank account?

15:35:21 15 A. I don't remember.

16 MS. SATAGAJ: Objection, form.

17 Q. (By Mr. Freeman) Okay. You don't remember, I  
18 guess, then, if you sent money to India that was used  
19 to purchase property on your behalf?

20 MS. SATAGAJ: Objection, form.

21 A. I don't.

22 Q. (By Mr. Freeman) Okay. Do you remember if  
23 you personally traveled to India to purchase any of  
24 these properties?

25 MS. SATAGAJ: Objection, form.

15:35:39 1 A. I don't remember.

2 Q. (By Mr. Freeman) Okay. The Indian  
3 properties, they -- they didn't appear in the final  
4 divorce decree, did they?

5 A. They are not.

6 Q. No?

7 A. They're not because they were already sold,  
8 right? So I don't think that it was stipulated we  
9 display all the properties dealing with marriage which  
10 are bought and sold.

11 Q. Okay. So none -- of the five properties that  
12 we've discussed here today, none of them were  
13 disclosed on the final decree of divorce, correct?

14 A. They -- they were already sold, yes.

15:36:24 15 Q. So none of them were disclosed on the final  
16 decree of divorce?

17 A. They're discl- -- they were disclosed, but  
18 they were sold during mediation, and all the --

19 Q. Well, where --

20 A. -- funds were distributed to both of us.

21 Q. Where are they reflected on the final decree  
22 of divorce?

23 A. So we had the inventory appraisalment sheet.

24 THE WITNESS: Do you have that, Jennifer?

25 Q. (By Mr. Freeman) On the final decree of

15:36:45 1 divorce?

2 A. No. That --

3 Q. Okay. Are they -- are they disclosed on the  
4 final decree of divorce though?

5 A. I -- I gave all the information, so --

6 Q. Okay. But are they reflected on the final  
7 decree of divorce?

8 A. If the divorce decree displays the properties  
9 which are already sold which I don't even own, what's  
10 the point?

11 Q. Okay.

12 A. Right? So if -- if somebo- -- if something  
13 is -- already is gone so they don't display them  
14 because I don't own it. So that's why the proceeds  
15:37:16 15 were distributed to both of us.

16 Q. Okay. So you are telling me, yes or no,  
17 these properties we've discussed today, are they  
18 reflected on the final decree of divorce?

19 A. No.

20 Q. So they are not disclosed on the final  
21 decree --

22 A. They are disclosed.

23 Q. -- of divorce?

24 A. They are disclosed. They were sold.

25 Q. Please answer my question, sir.

15:37:39 1                   They are not disclosed on the final  
2                   decree of divorce?

3                   A.   That's correct.

4                   Q.   Okay. Thank you.

5                   A.   You're welcome.

6                   Q.   Now, I just want to make sure we're -- we're  
7                   covering everything here.

8                                 That is a Krishnayapalem property, right?

9                   A.   Yes.

10                  Q.   It's not disclosed on the final decree of  
11                  divorce, right?

12                  A.   That -- it was already sold.

13                  Q.   But -- but Krishnayapalem is not disclosed on  
14                  the final decree of divorce?

15:38:03 15                                 MS. SATAGAJ: Mr. Freeman, if I may, I  
16                                 think it's just the -- the word choice. Instead of  
17                                 "disclosed," --

18                                 MR. FREEMAN: Okay.

19                                 MS. SATAGAJ: -- I think the question is,  
20                                 is it listed on the decree of divorce. I think that's  
21                                 where --

22                                 MR. FREEMAN: You think?

23                                 MS. SATAGAJ: -- the confusion comes.

24                                 Sorry.

25                                 Q.   (By Mr. Freeman) Let -- let me -- let me ask

15:38:18 1 it this way: Is -- I mean, I believe your testimony  
2 was none of these properties were disclosed on the  
3 final decree of divorce?

4 A. Yeah, because I was not -- I -- I was not  
5 (overtalk) then --

6 MR. FREEMAN: I understand, but object,  
7 nonresponsive.

8 A. Yeah.

9 Q. (By Mr. Freeman) Okay. So that would mean  
10 that the Krishnayapalem property was not disclosed on  
11 the final decree of divorce; is that correct?

12 A. That's correct.

13 Q. Okay. And that would mean the Pangra  
14 property wasn't disclosed on the final degree of  
15:38:44 15 divorce; is that correct?

16 A. Correct.

17 Q. Okay. And that would the Bongloor property  
18 was not disclosed on the final decree of divorce --

19 A. Correct.

20 Q. -- correct?

21 And that was mean the Miyapur property  
22 was not disclosed on the final decree of divorce --

23 A. Correct.

24 Q. -- correct?

25 And that mean the Mubarak Nagar property

15:38:58 1 was not disclosed on the final decree of divorce --

2 A. Correct.

3 Q. -- correct?

4 I appreciate you staying with me on that.

5 Now, why are they not listed on the final  
6 decree of divorce?

7 A. I -- I was not the owner.

8 Q. Okay.

9 A. So I don't own -- I -- I did not own them.

10 Q. So then they were not divided --

11 A. They were divided.

12 Q. -- in the divorce?

13 Excuse me, but they were not divided in  
14 the divorce?

15:39:22 15 A. They were divided. The -- the prop- -- the  
16 funds (indiscernible) was divided from the  
17 properties --

18 Q. Okay.

19 A. -- sold.

20 Q. These -- these properties, the ones we just  
21 went through --

22 A. Uh-huh.

23 Q. -- right, they were not divided in the  
24 divorce?

25 A. They -- the --

15:39:37 1 Q. Were --  
2 A. The proceeds were divided.  
3 Q. And -- and answer this question, please, sir.  
4 A. Yeah.  
5 Q. Were those properties themselves divided in  
6 the divorce?  
7 A. The proceeds --  
8 MS. SATAGAJ: Objection, form.  
9 A. -- are divided.  
10 Q. (By Mr. Freeman) Okay.  
11 A. The money came from that --  
12 Q. Then tell me --  
13 A. The money came from the --  
14 Q. (Overtalk.)  
15:39:54 15 A. -- proceeds. Like, they were divided.  
16 Q. Okay.  
17 A. Yeah.  
18 Q. And can you tell me how you disclosed those  
19 proceeds during divorce?  
20 A. Well, the mediator -- through the mediator.  
21 Q. You -- you told the mediator?  
22 A. Yeah, my attorney.  
23 Q. Did -- did you tell anyone else?  
24 A. No. My attorney --  
25 MS. SATAGAJ: Objection, form.

15:40:19 1 A. -- mediator, yeah.  
2 Q. (By Mr. Freeman) Just the mediator?  
3 A. Yeah. Attorney, also. Obviously, my  
4 attorney.  
5 Q. Okay. Did you tell Deepa Adema?  
6 A. Why -- I -- I was not talking --  
7 MS. SATAGAJ: Objection, form.  
8 A. -- terms -- talking terms, so --  
9 Q. (By Mr. Freeman) Okay. So you never told  
10 Deepa Adema where the proceeds of any of these  
11 properties were; is that correct?  
12 MS. SATAGAJ: Objection, form.  
13 A. All the information was given.  
14 Q. (By Mr. Freeman) Okay. How was that given to  
15:40:42 15 Deepa Adema?  
16 A. I don't --  
17 MS. SATAGAJ: Objection, form.  
18 A. I don't remember.  
19 Q. (By Mr. Freeman) Do you have personal  
20 knowledge that -- that it was conveyed to Deepa Adema  
21 where the proceeds of all of these properties were?  
22 MS. SATAGAJ: Objection, form.  
23 A. No.  
24 Q. (By Mr. Freeman) And you don't have personal  
25 knowledge that it was conveyed to Deepa Adema where



15:41:01 1 the proceeds of any of the properties at issue were --

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) -- correct --

4 A. No.

5 Q. -- as of the time of your divorce?

6 A. Correct.

7 MS. SATAGAJ: Objection, form.

8 Q. (By Mr. Freeman) And so you -- you don't have  
9 personal knowledge, sir?

10 A. I -- I gave all the -- all the proceeds to my  
11 attorney, so my attorney work with --

12 Q. Okay.

13 A. -- work with them, so --

14 Q. But you don't have personal knowledge that it  
15:41:21 15 was disclosed to -- to Deepa Adema where the proceeds  
16 of the Krishnayapalem property were at the time of  
17 divorce --

18 A. No. They were --

19 Q. -- correct?

20 MS. SATAGAJ: Objection, form.

21 A. They were all disclosed.

22 Q. (By Mr. Freeman) I -- I thought you just told  
23 me that you didn't -- you didn't have personal  
24 knowledge that it was disclosed to Deepa Adema?

25 A. I did not disclose to her directly, but I

15:41:43 1 gave it -- I give -- I gave the information to my  
2 attorney.

3 Q. So how do you --

4 A. So my attorney has communicated to them to  
5 their attorney.

6 Q. Okay. But you -- you didn't do that?

7 A. I did not.

8 Q. And you didn't actually see it done?

9 A. I -- I don't know. Like, I gave it to my  
10 attorney.

11 Q. Got it.

12 But -- but what I'm asking is: What did  
13 you see yourself? Do you have personal knowledge that  
14 anyone ever told Deepa Adema where the proceeds from  
15:42:08 15 the sale of the Krishnayapalem property were at the  
16 time of divorce?

17 A. I --

18 MS. SATAGAJ: Objection, form.

19 A. I don't remember. It's been a long time.

20 Q. (By Mr. Freeman) You don't remember?

21 A. Huh-uh.

22 Q. Okay. Do you have personal knowledge of  
23 whether anyone disclosed to Deepa Adema where the  
24 proceeds of the Pangra property were at the time of  
25 divorce?

15:42:29 1 MS. SATAGAJ: Objection, form.  
2 A. I don't remember.  
3 Q. (By Mr. Freeman) You don't remember?  
4 Do you have personal knowledge of whether  
5 anyone told Deepa Adema where the proceeds of the  
6 Bongloor property were at the time of divorce?  
7 MS. SATAGAJ: Objection, form.  
8 A. I don't remember.  
9 Q. (By Mr. Freeman) Okay. And you don't have  
10 personal knowledge, do you, of -- of whether anyone  
11 told or conveyed to Deepa Adema where the proceeds of  
12 the Miyapur property were at the time of divorce?  
13 A. I don't know.  
14 MS. SATAGAJ: Objection, form.  
15:43:01 15 Q. (By Mr. Freeman) Okay. You don't remember?  
16 A. I don't remember. I don't know.  
17 Q. But you don't remember --  
18 A. Because I -- I did my part.  
19 Q. You don't --  
20 A. I gave it to my attorney.  
21 MR. FREEMAN: Objection, nonresponsive.  
22 Q. (By Mr. Freeman) But you don't remember ever  
23 seeing that --  
24 A. I don't know.  
25 MS. SATAGAJ: Objection, form.

15:43:12 1 Q. (By Mr. Freeman) -- or hearing that it was  
2 done --

3 MS. SATAGAJ: Objection, form.

4 Q. (By Mr. Freeman) -- correct?

5 A. I don't know.

6 Q. Okay. And you don't have personal knowledge  
7 that anyone ever disclosed to Deepa Adema where the  
8 proceeds from the sale of the Mubarak -- Mubarak Nagar  
9 property were at the time of the divorce --

10 A. I don't know.

11 MS. SATAGAJ: Objection, form.

12 Q. (By Mr. Freeman) -- right?

13 So you -- you don't have any personal  
14 knowledge or reason to believe that the -- the

15:43:38 15 information about where the proceeds from any of these  
16 properties were that that hadn't been conveyed to  
17 Deepa Adema at the time of divorce, correct?

18 MS. SATAGAJ: Objection, form.

19 A. I don't know. My attorney may have conveyed  
20 it. I don't know.

21 Q. (By Mr. Freeman) Okay. And you don't know if  
22 anyone ever conveyed where any of the money that was  
23 in the I- -- ICIC properties bank accounts, whether  
24 that was ever conveyed to Deepa Adema prior to the  
25 divorce either, do you?

15:44:02 1 A. No. That --

2 MS. SATAGAJ: Objection, form.

3 A. All those -- all those money was settled,  
4 ICIC Bank money.

5 Q. (By Mr. Freeman) And how was that settled?

6 A. We calculated the numbers. Whatever it was  
7 there, it was settled, and she got her portion.

8 MR. FREEMAN: Okay. I want to let the  
9 record reflect that the witness looked off to the  
10 side, made eye contact with someone in the room, and  
11 provided a different answer than has been provided to  
12 this line of questions --

13 A. I don't follow you.

14 MR. FREEMAN: -- prior to that.

15:44:34 15 Q. (By Mr. Freeman) Okay.

16 A. Okay.

17 Q. Mr. Chintam, can you explain the answer you  
18 just gave me about the bank accounts?

19 A. Yeah. The money was distributed --

20 Q. Okay.

21 A. -- the leftover money.

22 Q. Okay. Where was it distributed?

23 A. During the mediation settlement -- the  
24 mediation day.

25 Q. Okay. And did -- did you ever see anyone

15:45:00 1 discuss that with Deepa Adema?

2 MS. SATAGAJ: Objection, form.

3 A. I don't know.

4 Q. (By Mr. Freeman) No?

5 You -- you don't remember that, do you?

6 A. I don't know.

7 Q. Did you ever hear anyone discussing that with  
8 Deepa Adema?

9 A. I don't know.

10 MS. SATAGAJ: Objection, object.

11 Q. (By Mr. Freeman) Did you ever -- do you have  
12 any personal knowledge of anyone conveying to Deepa  
13 Adema where the funds that had been in the ICIC  
14 accounts -- where those funds had gone at the time of  
15:45:24 15 mediation or at the time of divorce?

16 MS. SATAGAJ: Objection, form.

17 A. I don't remember.

18 Q. (By Mr. Freeman) No?

19 A. No.

20 Q. So you don't remember?

21 A. I don't remember.

22 Q. That's your best testimony, as we sit here  
23 today, correct, sir?

24 A. Yeah.

25 Q. Okay. Do you think that's something you

15:45:36 1 would remember?

2 A. I don't remember.

3 Q. And that's been an important issue in this  
4 case, has it not?

5 MS. SATAGAJ: Objection, form.

6 A. It has -- it has been distributed.

7 Q. (By Mr. Freeman) And you believe that that is  
8 actually so important in this case that it dictates  
9 the outcome of the case, correct?

10 A. Okay. I know what -- I know what was  
11 (overtalk).

12 Q. It's a very important issue to you, correct?

13 THE REPORTER: One at a time. One at a  
14 time.

15:45:53 15 A. I know what the outcome will come.

16 Q. (By Mr. Freeman) Okay. But as we sit here  
17 today --

18 A. Yes.

19 Q. -- you cannot say that you have personal  
20 knowledge of any of that ever occurring?

21 A. My --

22 MS. SATAGAJ: Objection, form.

23 A. I -- I communicated everything to my  
24 attorney.

25 Q. (By Mr. Freeman) Got it.

15:46:05 1 A. Thank you.  
2 Q. Okay.  
3 A. Yeah.  
4 Q. Would you agree that each of these properties  
5 at issue had value?  
6 A. Yes.  
7 Q. Okay. But you don't know how much?  
8 A. Yes. It's all -- it's all -- it's all --  
9 all -- everything was given.  
10 Q. Okay. Sir, if you would, look at Exhibit  
11 28.  
12 MR. FREEMAN: I'm conscious of 4:00.  
13 MS. SATAGAJ: What?  
14 MR. FREEMAN: I'm conscious of 4:00.  
15:46:34 15 Q. (By Mr. Freeman) Okay. Sir, do you recognize  
16 this document?  
17 A. No. It's -- it's been a long time. I  
18 don't -- I don't remember anything.  
19 Q. Okay. So you don't know what this is?  
20 A. Huh-uh.  
21 Q. Does it appear to be an email?  
22 MS. SATAGAJ: Objection, form.  
23 A. I have no idea. I don't remember anything.  
24 Q. (By Mr. Freeman) You don't remember anything?  
25 A. Yeah.



15:47:00 1 Q. Do you remember anything relevant to this  
2 case?

3 A. I answered to the best of my knowledge.

4 Q. Okay.

5 A. So --

6 Q. Is this -- in fact, does it -- does it state  
7 that it's an email through Gmail, and is there, in  
8 fact, on that page an email from bonibobj@gmail.com?

9 A. Uh-huh, yes.

10 Q. Okay. And was that email that you sent to  
11 Sandeep Kumar?

12 A. Looks like.

13 Q. Okay. And did you cc Bhupal?

14 A. I see that.

15:47:40 15 Q. Okay. And did you cc -- did you cc Kamireddy  
16 Mahendar?

17 A. I see it.

18 Q. Okay. And is the subject line "Land Near  
19 Medchal"?

20 A. Uh-huh, yes.

21 Q. Okay. Who are each of the individuals on  
22 this -- this email?

23 MS. SATAGAJ: Objection, form.

24 A. Just friends.

25 Q. (By Mr. Freeman) Okay. Who is Mahendar?

15:48:10 1 A. Friend.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) A friend?

4 A. Yes.

5 Q. How long had you known Mahendar?

6 MS. SATAGAJ: Objection, form.

7 A. Like, quite a few years.

8 Q. (By Mr. Freeman) Okay. Were you going to  
9 purchase this property 50/50 with him?

10 MS. SATAGAJ: Objection, form.

11 A. I don't remember.

12 Q. (By Mr. Freeman) Okay.

13 A. I did not buy this property, so I have no  
14 idea.

15:48:25 15 Q. Did you think that the -- the value of this  
16 property was around 44 -- 45 lacs per acre?

17 A. I --

18 MS. SATAGAJ: Objection, form.

19 A. No. We did not buy this property. I have no  
20 idea --

21 Q. (By Mr. Freeman) Okay.

22 A. -- of this. I --

23 Q. Did you seek any advice from any attorneys  
24 regarding any of the properties at issue in this case?

25 A. No.

15:48:47 1 MS. SATAGAJ: Objection. I'm instructing  
2 the witness --

3 Q. (By Mr. Freeman) No?

4 MS. SATAGAJ: -- not to answer.

5 A. No.

6 MS. SATAGAJ: It invades attorney-client  
7 privilege.

8 MR. FREEMAN: He can tell me whether he  
9 sought advice from an attorney about the properties.  
10 I'm not asking about the content of that advice.

11 A. No.

12 Q. (By Mr. Freeman) You didn't?

13 And not prior to the divorce?

14 A. No.

15:49:07 15 Q. And not during the divorce?

16 A. No.

17 Q. Okay. Vectra Infosys --

18 MR. FREEMAN: Do you need a few minutes  
19 before? Do you like need to jump off now?

20 MS. SATAGAJ: Five minutes.

21 MR. FREEMAN: Okay.

22 Q. (By Mr. Freeman) Mr. Chintam, what is Vectra  
23 Infosys?

24 MS. SATAGAJ: Objection, form.

25 Q. (By Mr. Freeman) What is Vectra Infosys, Inc?

15:49:35 1 A. It's an IT software company, staffing  
2 company.

3 Q. Okay. And what's your position with Vectra  
4 Infosys?

5 MS. SATAGAJ: Objection, form.

6 A. It was awarded to me in the divorce.

7 Q. (By Mr. Freeman) Okay. Do you have a  
8 position there?

9 MS. SATAGAJ: Objection, form.

10 A. Yeah, I own it.

11 Q. (By Mr. Freeman) You own it?

12 Okay. Have you always owned Vectra  
13 Infosys?

14 MS. SATAGAJ: Objection, form.

15:49:53 15 A. No. It was awarded in the --

16 Q. (By Mr. Freeman) Okay. But did you always  
17 control Vectra Infosys?

18 A. My wife and myself, we both used to run it.

19 Q. Okay. So you're saying that Deepa was  
20 actively involved in managing Vectra --

21 A. Yes.

22 Q. -- Infosys?

23 A. Yes.

24 MS. SATAGAJ: Objection, form.

25 Q. (By Mr. Freeman) Okay. Did Vectra Infosys

15:50:13 1 just lose a court case that was filed by Sandeep Kumar  
2 Adema?

3 MS. SATAGAJ: Objection, form.

4 A. It's -- it's not relevant here.

5 Q. (By Mr. Freeman) Okay.

6 A. So it was -- it was settled, so --

7 Q. Okay.

8 A. It's not relevant, so --

9 Q. It was settled --

10 A. Yes.

11 Q. -- sir?

12 A. Yes.

13 Q. Was it settled --

14 A. Yes.

15:50:29 15 MS. SATAGAJ: Objection, form.

16 Q. (By Mr. Freeman) -- or was there a judgment  
17 issued?

18 MS. SATAGAJ: Objection, form.

19 A. A judgment came, but we settled, yeah.

20 Q. (By Mr. Freeman) Okay. So did -- did Vectra,  
21 in fact, lose a court case that was filed by Sandeep  
22 Kumar?

23 MS. SATAGAJ: Objection, form.

24 A. It's not part of this divorce --

25 Q. (By Mr. Freeman) Okay.

15:50:42 1 A. -- so I'm not going to answer.

2 Q. Okay. So are you telling me you will not  
3 answer the question whether Vectra was just involved  
4 in a court case with Sandeep Kumar?

5 MS. SATAGAJ: Objection, form.

6 A. Yes. I am not going to answer anything.

7 Q. (By Mr. Freeman) Okay.

8 A. If it's not -- see, I patiently answer  
9 everything which is related to the properties in the  
10 original petition, so --

11 Q. Okay. What does Vectra Infosys pay you?

12 MS. SATAGAJ: Objection, form.

13 A. I'm -- I'm -- I'm not answering that.

14 Q. (By Mr. Freeman) So you won't answer what  
15 Vectra Infosys pays you?

16 A. Yes.

17 Q. Okay. Will you answer how Vectra Infosys  
18 pays you?

19 MS. SATAGAJ: Objection --

20 A. No.

21 MS. SATAGAJ: -- form.

22 Q. (By Mr. Freeman) No?

23 A. No.

24 Q. Will you answer whether what Vectra Infosys  
25 pays you is reported on a W-2?

15:51:33 1 A. No.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) Can you tell me whether you  
4 receive a K1 from Vectra Infosys?

5 A. No.

6 MS. SATAGAJ: Objection, form.

7 Q. (By Mr. Freeman) Can you tell me whether you  
8 receive a 1099 from Vectra Infosys?

9 A. No.

10 MS. SATAGAJ: Objection, form.

11 Q. (By Mr. Freeman) So you are refusing to  
12 answer each of the questions?

13 A. Yes. I will answer related to the  
14 properties. So this is nothing to do with this case,

15:51:54 15 so --

16 Q. Okay. Do you do consulting work outside of  
17 Vectra Infosys?

18 MS. SATAGAJ: Objection, form.

19 A. I'm not answering.

20 Q. (By Mr. Freeman) Okay. So you won't tell me  
21 whether you do any consulting work outside --

22 A. That it has --

23 Q. -- of Vectra?

24 A. That has nothing to do with this.

25 Q. What is your basis for your refusal to answer

15:52:14 1 these questions?

2 A. It's not part of the original petition, so  
3 that's my personal life, so --

4 Q. Okay.

5 MS. SATAGAJ: Mr. Freeman, do you want to  
6 take that break early? And if you --

7 MR. FREEMAN: Yeah, let's do that.

8 MS. SATAGAJ: -- just want to hang out in  
9 the conference room.

10 THE WITNESS: Okay.

11 THE VIDEOGRAPHER: Counsel, off the  
12 record?

13 MR. FREEMAN: Off the record. Thank you.

14 THE VIDEOGRAPHER: We're off the record  
15 at 3:51 p.m.

16 (Break from 3:51 p.m. to 4:43 p.m.)

17 THE VIDEOGRAPHER: We're back on the  
18 record at 4:43 p.m.

19 Q. (By Mr. Freeman) Okay. Mr. Chintam, do you  
20 do any consulting work outside of Vectra?

21 MS. SATAGAJ: Objection, form.

22 A. I'm not answering.

23 Q. (By Mr. Freeman) Do you do any consulting  
24 work outside of Vectra Infosys, Inc.?

25 MS. SATAGAJ: Objection, form.



16:44:34 1 A. No response.

2 Q. (By Mr. Freeman) Okay. So are you refusing  
3 to answer my question?

4 A. Yes, that particular question.

5 Q. Okay. I'm going to ask you some questions I  
6 went over prior to the break. I want to ensure that  
7 it's your position you're refusing to answer these.

8 What does Vectra Infosys pay you?

9 MS. SATAGAJ: Objection, form.

10 A. It's -- yeah, no, I'm not answering.

11 Q. (By Mr. Freeman) Okay. Do you have an  
12 objection to that question?

13 A. Yeah, no response.

14 Q. No response?

16:45:10 15 A. Yes.

16 Q. Okay. So it's your position you're providing  
17 no response to this question?

18 A. Yes.

19 MS. SATAGAJ: Objection, form.

20 MR. FREEMAN: Okay. Counsel, do you want  
21 to give him any instruction, or do you want me to go  
22 on? I -- I do want an answer to the question.

23 MS. SATAGAJ: Based on the ruling from  
24 our conference with Judge Lopez earlier today, I'd  
25 just like to remind you that questions that are being

16:45:46 1 asked in which the answer may or may not be relevant  
2 to the pending lawsuit will be something that will be  
3 determined by the Judge so even if -- at trial or at a  
4 future hearing.

5 So even if I object to form, if you know  
6 the answer to Mr. Freeman's question, then you should  
7 answer it. If you don't know the answer, then  
8 obviously you -- you don't know, and you can respond  
9 accordingly. And, again, as Mr. Freeman mentioned  
10 this morning, if you don't understand a question,  
11 please continue to ask Mr. Freeman for  
12 clarification.

13 THE WITNESS: Okay.

14 Q. (By Mr. Freeman) Mr. Chintam, what does  
16:46:30 15 Vectra Infosys pay you?

16 MS. SATAGAJ: Objection, form.

17 A. It's my own company, so -- so --

18 Q. (By Mr. Freeman) Okay. So does that mean you  
19 know?

20 MS. SATAGAJ: Objection, form.

21 A. Yes.

22 Q. (By Mr. Freeman) Okay. And what is the  
23 answer to that question?

24 MS. SATAGAJ: Objection, form.

25 A. I -- I get paid like 80k.

16:46:49 1 Q. (By Mr. Freeman) \$80,000?

2 A. Yes.

3 Q. Okay. Is that wages to you?

4 A. Yes.

5 MS. SATAGAJ: Objection, form.

6 Q. (By Mr. Freeman) Okay. Do you receive any  
7 other payments from Vectra Infosys?

8 MS. SATAGAJ: Objection, form.

9 A. No.

10 Q. (By Mr. Freeman) Okay. How does Vectra  
11 Infosys pay you?

12 MS. SATAGAJ: Objection, form.

13 A. I -- I am the owner of the company, so I get  
14 paid --

16:47:09 15 Q. (By Mr. Freeman) Okay. And --

16 A. -- for my work.

17 Q. Okay. And -- and how -- how is that payment  
18 made to you? In what form?

19 MS. SATAGAJ: Objection, form.

20 A. Paycheck.

21 Q. (By Mr. Freeman) A paycheck?

22 Do you receive a paycheck every two  
23 weeks?

24 A. No. Ev- --

25 MS. SATAGAJ: Objection, form.

16:47:23 1 A. Every month.

2 Q. (By Mr. Freeman) Every month?

3 Okay. Is that reported on a form W-2?

4 MS. SATAGAJ: Objection form.

5 A. Yes.

6 Q. (By Mr. Freeman) Okay. How is Vectra Infosys

7 taxed?

8 MS. SATAGAJ: Objection, form.

9 A. I don't understand your tax question.

10 Q. (By Mr. Freeman) Do you know how it is

11 treated for tax purposes?

12 MS. SATAGAJ: Objection, form.

13 A. I don't know.

14 Q. (By Mr. Freeman) Okay. Do you receive a K-1

16:47:45 15 Vectra Infosys?

16 MS. SATAGAJ: Objection, form.

17 A. I don't -- I don't know.

18 Q. (By Mr. Freeman) Okay. Do you receive a 1099

19 from Vectra Infosys?

20 MS. SATAGAJ: Objection, form.

21 A. I don't know.

22 Q. (By Mr. Freeman) Okay. Do you do any

23 consulting work outside of Vectra Infosys?

24 MS. SATAGAJ: Objection, form.

25 A. Yes.

16:48:00 1 Q. (By Mr. Freeman) Okay. What is that?  
2 MS. SATAGAJ: Objection, form.  
3 A. Consulting.  
4 Q. (By Mr. Freeman) Okay. Do you do that  
5 directly or through another entity?  
6 MS. SATAGAJ: Objection, form.  
7 A. Through other entity.  
8 Q. (By Mr. Freeman) Okay. What is that other  
9 entity?  
10 MS. SATAGAJ: Objection, form.  
11 A. It's Madiba.  
12 Q. (By Mr. Freeman) Can you spell that for us?  
13 A. M-a-d-i-b-a.  
14 Q. Madiba?  
16:48:19 15 A. Yes.  
16 Q. Okay. Do you own Madiba?  
17 A. No.  
18 Q. Who owns Madiba?  
19 MS. SATAGAJ: Objection, form.  
20 A. I don't know.  
21 Q. (By Mr. Freeman) What is Madiba?  
22 MS. SATAGAJ: Objection, form.  
23 A. It's a staffing company.  
24 Q. Okay. Do you have any ownership in Madiba?  
25 MS. SATAGAJ: Objection --

16:48:34 1 A. No.

2 MS. SATAGAJ: -- form.

3 Q. (By Mr. Freeman) Okay. How long have you  
4 worked for Madiba?

5 MS. SATAGAJ: Objection, form.

6 A. A couple of years.

7 Q. (By Mr. Freeman) Okay. What do you do for  
8 Madiba?

9 MS. SATAGAJ: Objection, form.

10 A. Software.

11 Q. (By Mr. Freeman) Okay. And can you  
12 elaborate?

13 MS. SATAGAJ: Objection, form.

14 A. It's a programming job.

16:48:50 15 Q. (By Mr. Freeman) Programming? Software  
16 programming?

17 A. Yes.

18 Q. Does Madiba staff you on other -- with other  
19 companies?

20 A. Yes.

21 MS. SATAGAJ: Objection, form.

22 Q. (By Mr. Freeman) To perform software  
23 programming for them?

24 MS. SATAGAJ: Objection, form.

25 A. Yes.

16:49:01 1 Q. (By Mr. Freeman) Okay. Do you report that  
2 income on your taxes?

3 MS. SATAGAJ: Objection, form.

4 A. Yes. That comes to the company, to Vectra.

5 Q. (By Mr. Freeman) Okay. So does that -- and  
6 that's what I want to know. Does that income go into  
7 Vectra --

8 A. Yes.

9 Q. -- Infosys?

10 Okay. And then is -- is -- that money  
11 that's paid to Vectra Infosys, is that sent by Vectra  
12 Infosys overseas?

13 MS. SATAGAJ: Objection, form.

14 A. No. I don't know what you're talking.

16:49:33 15 Q. (By Mr. Freeman) Is that money sent by Vectra  
16 Infosys to India?

17 MS. SATAGAJ: Objection, form.

18 A. I don't know.

19 Q. (By Mr. Freeman) You don't know?

20 A. I don't know.

21 MS. SATAGAJ: Objection.

22 Q. (By Mr. Freeman) Why do you not know?

23 MS. SATAGAJ: Objection --

24 A. I --

25 MS. SATAGAJ: -- form.

16:49:43 1 A. I don't know -- I don't know what you're  
2 talking about.

3 Q. (By Mr. Freeman) So as we sit here right now  
4 today, you can't tell me yes or no? You can only say  
5 "I don't know" to the question of whether Vectra  
6 Infosys sends the money that is paid from Madiba  
7 overseas to India?

8 A. No.

9 MS. SATAGAJ: Objection, form.

10 Q. (By Mr. Freeman) Okay. So --

11 A. It won't send, yeah.

12 Q. It don't --

13 A. It won't send, yeah.

14 Q. So you remember now; is that correct?

16:50:08 15 A. Yes.

16 Q. Okay. And your answer is...

17 A. Yeah, I -- I -- I don't send money to India  
18 for that.

19 Q. Does Vectra Infosys?

20 MS. SATAGAJ: Objection --

21 A. No.

22 MS. SATAGAJ: -- form.

23 Q. (By Mr. Freeman) No?

24 Okay. It doesn't send that to an Indian  
25 bank account?



16:50:22 1 MS. SATAGAJ: Objection, form.  
2 A. No.  
3 Q. (By Mr. Freeman) And you're absolutely  
4 certain of that?  
5 MS. SATAGAJ: Objection, form.  
6 A. Yes.  
7 Q. (By Mr. Freeman) Okay. Where is Vectra  
8 Informatik?  
9 MS. SATAGAJ: Objection, form.  
10 A. That's -- no longest exists.  
11 Q. (By Mr. Freeman) No longest exists?  
12 A. Yes.  
13 Q. When did that cease to exist?  
14 MS. SATAGAJ: Objection, form.  
16:50:38 15 A. During the 2017, 2018, so --  
16 Q. (By Mr. Freeman) Okay. 2017, 2018?  
17 A. Yes.  
18 Q. Okay. Who shut that company down?  
19 MS. SATAGAJ: Objection, form.  
20 A. My dad.  
21 Q. (By Mr. Freeman) Okay. Who owned that  
22 company?  
23 MS. SATAGAJ: Objection, form.  
24 A. My dad.  
25 Q. (By Mr. Freeman) You father owned that

16:50:55 1 company?

2 A. Yes.

3 Q. Not you?

4 A. No.

5 Q. Okay. Who controlled that company?

6 MS. SATAGAJ: Objection, form.

7 A. My dad.

8 Q. (By Mr. Freeman) Okay. What is your father's  
9 educational background?

10 MS. SATAGAJ: Objection, form.

11 A. My -- my father? Maybe elementary.

12 Q. (By Mr. Freeman) Elementary?

13 A. Yes.

14 Q. Okay. Can he read?

16:51:17 15 MS. SATAGAJ: Objection, form.

16 A. Yes.

17 Q. (By Mr. Freeman) Okay. And he owns this --  
18 this company?

19 MS. SATAGAJ: Objection, form.

20 Q. He owned this company?

21 A. Yeah.

22 MS. SATAGAJ: Objection, form.

23 A. He owned it before, so --

24 Q. (By Mr. Freeman) Did he always own it?

25 MS. SATAGAJ: Objection, form.

16:51:31 1 A. He had. He -- he owned it before, so it's --  
2 there are no operations, so --

3 Q. (By Mr. Freeman) Okay. Did you ever own this  
4 company?

5 A. No.

6 MS. SATAGAJ: Objection, form.

7 Q. (By Mr. Freeman) No?

8 Was this company awarded to you in the  
9 divorce?

10 MS. SATAGAJ: Objection, form.

11 A. I don't know.

12 Q. (By Mr. Freeman) Okay. Would you look at  
13 Exhibit 10?

14 A. Yeah, I'm on Exhibit 10.

16:52:00 15 Q. Page 36 of that.

16 A. Yeah.

17 Q. Okay. Was Vectra Informatik awarded to you  
18 in the divorce?

19 A. Let me look. You said 36, right?

20 Q. Yes, sir. Page --

21 A. Yes.

22 Q. -- 36 of 55.

23 A. Yes.

24 Q. Okay. Why was that awarded to you?

25 MS. SATAGAJ: Objection, form.

16:52:34 1 A. I have no idea.

2 Q. (By Mr. Freeman) Okay. But you don't own it?

3 A. Yeah.

4 Q. And your father owns it?

5 A. Yes.

6 MS. SATAGAJ: Objection, form.

7 Q. (By Mr. Freeman) And your father runs it?

8 MS. SATAGAJ: Objection, form.

9 A. Yes.

10 Q. (By Mr. Freeman) Does -- a company Oberon IT,

11 has it ever transferred money to Vectra Informatik?

12 MS. SATAGAJ: Objection, form.

13 A. I don't recollect.

14 Q. (By Mr. Freeman) You don't recollect? You

16:52:57 15 wouldn't recall?

16 A. No.

17 Q. Would you have ever been involved in a

18 company named Oberon IT transferring money to Vectra

19 Informatik?

20 A. I don't --

21 MS. SATAGAJ: Objection --

22 A. -- recollect.

23 MS. SATAGAJ: -- form.

24 Q. (By Mr. Freeman) Okay. And you don't have

25 any idea what that would be related to?

16:53:10 1 MS. SATAGAJ: Objection --

2 A. Yes.

3 MS. SATAGAJ: -- form.

4 Q. (By Mr. Freeman) Okay. Did you transfer

5 money ever to Vectra Informatik?

6 MS. SATAGAJ: Objection, form.

7 A. No. I don't -- I don't recollect.

8 Q. (By Mr. Freeman) No or you don't recollect?

9 A. I don't recollect.

10 Q. Okay. Vectra Informatik, did it ever have

11 employees?

12 MS. SATAGAJ: Objection, form.

13 A. I don't recollect.

14 Q. (By Mr. Freeman) Okay. Were funds from

16:53:34 15 Vectra Informatik Private Limited -- and you

16 understand when I refer to Vectra Informatik that

17 we're referring to Vectra Informatik Private Limited?

18 A. Yes.

19 Q. Okay. Were funds from Vectra Informatik ever

20 used to purchase property on your behalf?

21 MS. SATAGAJ: Objection, form.

22 A. No.

23 Q. (By Mr. Freeman) No?

24 A. No.

25 Q. And that you remember for sure?

16:53:54 1 A. Yes.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) Okay. Ever used to purchase  
4 property in your name?

5 MS. SATAGAJ: Objection, form.

6 A. I don't -- I don't recollect, no.

7 Q. (By Mr. Freeman) Is that a no or you don't  
8 recollect?

9 A. It's a --

10 MS. SATAGAJ: Objection --

11 A. -- no.

12 MS. SATAGAJ: -- form.

13 Q. (By Mr. Freeman) Okay. Were they ever used  
14 to purchase property in someone else's name?

16:54:11 15 MS. SATAGAJ: Objection, form.

16 A. No.

17 Q. (By Mr. Freeman) Does Vectra Informatik  
18 maintain bank accounts in India?

19 MS. SATAGAJ: Objection, form.

20 A. I don't recollect.

21 Q. (By Mr. Freeman) Okay. Does Vectra  
22 Informatik operate in the United States?

23 MS. SATAGAJ: Objection, form.

24 A. No.

25 Q. (By Mr. Freeman) Does Vectra Informatik --

16:54:25 1 does Vectra Infosys ever send money to Vectra  
2 Informatik?

3 A. I don't --

4 MS. SATAGAJ: Objection --

5 A. -- recollect.

6 MS. SATAGAJ: -- form.

7 Q. (By Mr. Freeman) Okay. You don't recollect?

8 A. Yes.

9 MS. SATAGAJ: Objection, form.

10 Q. (By Mr. Freeman) Okay. Does it ever -- does  
11 Vectra Infosys ever send money to Vectra Informatik in  
12 India for U.S. employees of Vectra Infosys?

13 MS. SATAGAJ: Objection, form.

14 A. I don't recollect.

16:54:57 15 Q. (By Mr. Freeman) Okay. Do you know if any of  
16 that money is sent to employee bank accounts in India?

17 MS. SATAGAJ: Objection, form.

18 A. (By Mr. Freeman) I don't recollect.

19 Q. To employee bank accounts in India that you  
20 set up?

21 MS. SATAGAJ: Objection, form.

22 A. I don't recollect.

23 Q. (By Mr. Freeman) And you don't recollect if  
24 someone else might have set up those accounts?

25 MS. SATAGAJ: Objection, form.

16:55:20 1 A. I don't know.

2 Q. (By Mr. Freeman) Did you ever have access to  
3 those accounts?

4 MS. SATAGAJ: Objection, form.

5 A. I don't recollect.

6 Q. (By Mr. Freeman) Have you ever had account  
7 statements for those accounts?

8 A. I don't.

9 MS. SATAGAJ: Objection, form.

10 Q. (By Mr. Freeman) Okay. Would you be able to  
11 provide a list of employees at Vectra Informatik that  
12 received payments?

13 MS. SATAGAJ: Objection, form.

14 A. I don't recollect.

16:55:38 15 Q. (By Mr. Freeman) Who is your CPA?

16 MS. SATAGAJ: Objection, form.

17 A. I have no CPA right now, so -- it's closed.

18 Q. (By Mr. Freeman) No?

19 A. So I am not operating anything, so --

20 Q. Okay. But who do you use as a CPA?

21 MS. SATAGAJ: Objection, form.

22 A. I don't recollect.

23 Q. (By Mr. Freeman) Who have you used in the  
24 past?

25 A. I --



16:55:55 1 MS. SATAGAJ: Objection --  
2 A. -- don't recollect.  
3 MS. SATAGAJ: -- form.  
4 Q. (By Mr. Freeman) Vish Palepu?  
5 A. No. He's my U.S. CPA.  
6 Q. Okay. And that -- that's what I'm asking.  
7 A. No. He's -- he does my CPA here.  
8 Q. Do you have an Indian CPA?  
9 A. I --  
10 MS. SATAGAJ: Objection, form.  
11 A. -- don't have anybody.  
12 Q. (By Mr. Freeman) Okay.  
13 A. No.  
14 Q. Why would you believe I was asking about an  
16:56:12 15 Indian CPA?  
16 A. I have no idea.  
17 Q. Okay.  
18 A. Because you're talking about Vectra  
19 Informatik, I thought you were --  
20 Q. Okay.  
21 A. -- asking about that.  
22 Q. And so you never -- you never engaged in an  
23 India CPA for Vectra Informatik?  
24 MS. SATAGAJ: Objection, form.  
25 A. I don't recollect.

16:56:28 1 Q. (By Mr. Freeman) Okay. Have you ever  
2 discussed any payments made to Vectra Informatik with  
3 Vish Palepu?

4 MS. SATAGAJ: Objection, form.

5 A. I don't recollect.

6 Q. (By Mr. Freeman) You don't recollect that?

7 What is Oberon IT?

8 MS. SATAGAJ: Objection, form.

9 A. It's -- it's a staffing company.

10 Q. (By Mr. Freeman) Okay. Does Vectra Infosys  
11 make payments to Oberon IT?

12 MS. SATAGAJ: Objection, form.

13 A. It's only based on the services.

14 Q. Excuse me?

16:56:55 15 A. It's only based on the services.

16 Q. Only based on the services?

17 MS. SATAGAJ: Objection, form.

18 A. Yes.

19 Q. (By Mr. Freeman) And what do you mean by  
20 that?

21 A. Staffing services.

22 MS. SATAGAJ: Objection, form.

23 Q. (By Mr. Freeman) So Oberon IT provides  
24 staffing services?

25 MS. SATAGAJ: Objection --

16:57:08 1 A. Yes.

2 MS. SATAGAJ: -- form.

3 Q. (By Mr. Freeman) And the only payments that  
4 Vectra Infosys has ever made to Oberon IT were for  
5 staffing services?

6 MS. SATAGAJ: Objection, form.

7 A. Yes.

8 Q. (By Mr. Freeman) You're absolutely certain of  
9 that?

10 MS. SATAGAJ: Objection, form.

11 A. Yes.

12 Q. (By Mr. Freeman) Okay. Is it possible that  
13 Vectra Infosys has ever made payments to Oberon IT for  
14 any other reason?

16:57:30 15 MS. SATAGAJ: Objection, form.

16 A. I don't recollect.

17 Q. (By Mr. Freeman) Okay. So you don't  
18 recollect any other reason?

19 MS. SATAGAJ: Objection, form.

20 A. (No verbal response.)

21 Q. (By Mr. Freeman) Would You look at Exhibit  
22 18, sir?

23 A. Yeah.

24 Q. Okay. Do you recognize this?

25 A. This is 2015. I -- no, I don't.

16:57:53 1 Q. You don't recognize it?

2 Is this an email from you?

3 A. It says it's from me, but I don't recollect.

4 Q. Okay. Is that at the email

5 bonibobj@gmail.com that it appears to be sent from?

6 MS. SATAGAJ: Objection, form.

7 A. Yeah, I don't recollect. Yes, but it that's,  
8 but I don't recollect.

9 Q. (By Mr. Freeman) Okay. Is the date November  
10 30th, 2015?

11 MS. SATAGAJ: Objection, form.

12 A. It says that.

13 Q. (By Mr. Freeman) Okay. Was your Gmail  
14 account hacked at any time in 2015?

16:58:27 15 MS. SATAGAJ: Objection, form.

16 A. I -- I don't recollect. I don't know.

17 Q. (By Mr. Freeman) You don't have any reason to  
18 believe anyone else was sending emails out through  
19 your Gmail account?

20 A. I don't --

21 MS. SATAGAJ: Objection, form.

22 A. -- recollect.

23 Q. (By Mr. Freeman) Okay.

24 A. My -- my wife might be doing, but I don't  
25 recollect.

16:58:43 1 Q. Okay.  
2 A. I don't know.  
3 Q. You don't know?  
4 You're just kind of speculating --  
5 A. My ex-wife, I'm sorry.  
6 Q. -- that's possible?  
7 Yeah. This email, did you state here,  
8 "This completes the transaction with Oberon IT"?  
9 MS. SATAGAJ: Objection, form.  
10 A. Yeah, I don't recollect.  
11 Q. (By Mr. Freeman) Who is Jhansi Neerudu  
12 reflected there?  
13 MS. SATAGAJ: Objection, form.  
14 A. I don't recollect.  
16:59:02 15 Q. (By Mr. Freeman) You -- you don't know who  
16 Jhansi with the J-h-a-n-s-i?  
17 A. Yeah, I don't recollect. It's been a long  
18 time, so --  
19 Q. Okay. With the Oberon IT email?  
20 MS. SATAGAJ: Objection --  
21 A. No.  
22 MS. SATAGAJ: -- form.  
23 A. I don't recollect.  
24 Q. (By Mr. Freeman) Okay. Do you recall who  
25 Venugopal Neerudu is?

16:59:23 1 A. Yeah. He's my --  
2 MS. SATAGAJ: Objection, form.  
3 A. He's my friend. He lives here.  
4 Q. (By Mr. Freeman) Okay. And -- and does he  
5 work at Oberon IT?  
6 MS. SATAGAJ: Objection, form.  
7 A. I don't know.  
8 Q. (By Mr. Freeman) Did he ever work at Oberon  
9 IT?  
10 MS. SATAGAJ: Objection, form.  
11 A. I don't know.  
12 Q. (By Mr. Freeman) But he's your friend?  
13 A. Yes.  
14 MS. SATAGAJ: Objection, form.  
16:59:41 15 Q. (By Mr. Freeman) Is he also your neighbor?  
16 MS. SATAGAJ: Objection, form.  
17 A. Yes.  
18 Q. (By Mr. Freeman) Okay.  
19 A. He was.  
20 Q. How long have you known him?  
21 MS. SATAGAJ: Objection, form.  
22 A. I know him like when I was here.  
23 Q. (By Mr. Freeman) Okay. And is he on this  
24 email chain?  
25 MS. SATAGAJ: Objection, form.

16:59:55 1 A. I don't recollect.

2 Q. (By Mr. Freeman) Okay. Can you just take a  
3 look at it?

4 A. Yeah. It looks like the name is here, but I  
5 don't recollect about this email.

6 Q. Okay.

7 A. I haven't (indiscernible) don't know what.

8 Q. Okay. Who is Himabindu Laxmi?

9 MS. SATAGAJ: Objection, form.

10 A. I don't know.

11 Q. (By Mr. Freeman) It's there on the email. It  
12 says H-i-m-a-b-i-n-d-u L-a-x-m-i. Do you know who  
13 that is?

14 A. I don't know.

17:00:22 15 MS. SATAGAJ: Objection, form.

16 Q. (By Mr. Freeman) Who is Bindu?

17 A. I don't know.

18 Q. Okay. Can you take a -- just a minute to  
19 review this document and explain what this email is?

20 A. Yeah, sure.

21 Yeah, I don't recollect this email.

22 Q. Okay.

23 MS. SATAGAJ: Mr. Freeman, will you  
24 please clarify, the Exhibit 18 that I have is more  
25 than one email.

17:00:51 1 MR. FREEMAN: It's chai- -- an email  
2 chain, yes. I'm on --  
3 MS. SATAGAJ: No, I mean --  
4 MR. FREEMAN: -- Bates-labeled document  
5 ADEMA000277.  
6 MS. SATAGAJ: Okay.  
7 MR. FREEMAN: Okay. That's what I'm  
8 asking about right now. That's where each of these  
9 names appeared. I'm asking who they are.  
10 MS. SATAGAJ: So in the Exhibit 18 that I  
11 have, it goes on, and then there's a different  
12 email --  
13 MR. FREEMAN: Uh-huh.  
14 MS. SATAGAJ: -- beginning with  
17:01:20 15 ADEMA000279.  
16 MR. FREEMAN: Yeah.  
17 MS. SATAGAJ: Okay. So right now, we're  
18 just talking about the 277 to 278?  
19 MR. FREEMAN: Correct.  
20 MS. SATAGAJ: Okay. Thank you.  
21 Q. (By Mr. Freeman) Mr. Chintam, there's an  
22 email there reflected towards the bottom of the first  
23 page of Exhibit 18, and in that email, Jhansi from of  
24 Oberon IT states, "Hi, Boni. As per our conversation,  
25 we are ready to give you 98,03,750/ that is \$155,000.



17:02:00 1 You have given to us \$150,000. Rest of amount would  
2 be -- and there's calculation, and it says please give  
3 check to Bindu."

4 What conversation is this referencing?

5 MS. SATAGAJ: Objection, form.

6 A. I -- I don't recollect.

7 Q. (By Mr. Freeman) Okay. And it states, "This  
8 completes the transaction with Oberon IT."

9 What was the transaction?

10 MS. SATAGAJ: Objection, form.

11 A. I don't recollect.

12 Q. (By Mr. Freeman) Would you have any documents  
13 for this transaction?

14 MS. SATAGAJ: Objection, form.

17:02:29 15 A. I don't recollect.

16 Q. (By Mr. Freeman) Why did -- why did you give  
17 Oberon IT \$150,000?

18 MS. SATAGAJ: Objection, form.

19 A. I don't recollect.

20 Q. (By Mr. Freeman) Did you, in fact, give  
21 Oberon IT \$150,000?

22 MS. SATAGAJ: Objection, form.

23 A. I don't recollect.

24 Q. (By Mr. Freeman) Okay. And what was the  
25 result of the amount of \$24,375 referenced in that

17:02:50 1 email?

2 MS. SATAGAJ: Objection, form.

3 A. I don't recollect.

4 Q. (By Mr. Freeman) Do you know how it breaks  
5 down?

6 MS. SATAGAJ: Objection, form.

7 A. I don't recollect.

8 Q. (By Mr. Freeman) What the conversion rate  
9 was?

10 MS. SATAGAJ: Objection, form.

11 A. I -- I don't recollect.

12 Q. (By Mr. Freeman) Total in the INR?

13 MS. SATAGAJ: Objection, form.

14 A. Yeah, I don't -- I don't -- I don't

17:03:05 15 recollect.

16 Q. (By Mr. Freeman) Who owns Oberon IT?

17 A. I don't know.

18 MS. SATAGAJ: Objection, form.

19 Q. (By Mr. Freeman) Have you ever known?

20 MS. SATAGAJ: Objection, form.

21 A. I don't know.

22 Q. (By Mr. Freeman) Okay. In the past, does  
23 anyone you know own Oberon IT?

24 MS. SATAGAJ: Objection, form.

25 A. No.

17:03:19 1 Q. (By Mr. Freeman) Have you ever -- have you  
2 ever directed Oberon to send money to India?

3 MS. SATAGAJ: Objection, form.

4 A. No.

5 Q. (By Mr. Freeman) Are you aware of Oberon IT  
6 sending money to India?

7 MS. SATAGAJ: Objection --

8 A. No.

9 MS. SATAGAJ: -- form.

10 A. I don't recollect that, yeah.

11 Q. (By Mr. Freeman) Okay. Had money paid to you  
12 by an -- have you ever had money paid to you by an  
13 affiliate of Oberon in India?

14 MS. SATAGAJ: Objection, form.

17:03:42 15 A. I don't recollect.

16 Q. (By Mr. Freeman) Okay. Did you ever direct  
17 Sandeep Adema to get -- get that cash in India?

18 MS. SATAGAJ: Objection, form.

19 A. I don't recollect.

20 Q. (By Mr. Freeman) Cash that Oberon IT sent to  
21 India?

22 MS. SATAGAJ: Objection, form.

23 A. I don't recollect.

24 Q. (By Mr. Freeman) Did you ever instruct him to  
25 use that cash for purchase of properties in India?

17:04:06 1 MS. SATAGAJ: Objection, form.  
2 A. I don't recollect.  
3 Q. (By Mr. Freeman) You don't recall doing that?  
4 A. Huh-uh.  
5 Q. It's possible, you just don't recall?  
6 A. I don't know.  
7 Q. Yeah. When you say "I don't recollect," is  
8 it fair for me to understand that it's possible, you  
9 just don't know one way or the other?  
10 A. Yeah, I --  
11 MS. SATAGAJ: Objection --  
12 A. -- I don't know.  
13 MS. SATAGAJ: -- form.  
14 Q. (By Mr. Freeman) Okay. And every time that  
17:04:22 15 you use that phrase "I don't recollect," is it fair  
16 for me to understand from that that it's possible, you  
17 just don't know one way or the other?  
18 MS. SATAGAJ: Objection, form.  
19 A. Yeah, I don't know.  
20 Q. (By Mr. Freeman) Okay. Oberon IT, is this  
21 how you moved money to India to purchase properties?  
22 MS. SATAGAJ: Objection, form.  
23 A. I don't recollect this email. You're asking  
24 me the same thing again and again.  
25 Q. (By Mr. Freeman) Okay.

17:04:44 1 A. So --

2 Q. Look at Exhibit 9, Mr. Chintam.

3 A. Yeah.

4 Q. And you provided these affidavits in  
5 connection with this case?

6 A. Uh-huh, yes.

7 Q. And these are signed under penalty of  
8 perjury, correct?

9 A. What is it?

10 Q. These are signed under penalty of perjury?

11 A. Yes, under notary.

12 Q. Okay. At the bottom of Page 1 on each  
13 affidavit, you say, "I received the funds for the sale  
14 of each of these properties prior to the divorce;" is  
17:05:22 15 that correct?

16 A. Yes.

17 Q. And did you know that to be a correct fact  
18 when you gave this affidavit?

19 A. Yes.

20 Q. In what form did you receive those funds?

21 MS. SATAGAJ: Objection, form.

22 A. I -- I don't remember.

23 Q. (By Mr. Freeman) Okay. Did you remember at  
24 the time you signed this affidavit?

25 MS. SATAGAJ: Objection, form.

17:05:41 1 A. No.

2 Q. (By Mr. Freeman) No?

3 How did you know that you received the  
4 funds for the sale of each of these properties prior  
5 to the divorce?

6 A. I mean, they were all --

7 MS. SATAGAJ: Objection, form.

8 A. -- all done in 2016, so --

9 Q. (By Mr. Freeman) Okay. And you're saying you  
10 don't really know if you received the funds?

11 A. No, I --

12 MS. SATAGAJ: Objection.

13 A. -- received it 2016.

14 Q. (By Mr. Freeman) Okay. But you don't know  
17:05:58 15 what form you received them in?

16 MS. SATAGAJ: Objection --

17 A. No.

18 MS. SATAGAJ: -- form.

19 Q. (By Mr. Freeman) You don't know if it was  
20 cash or check?

21 A. Yeah, I don't recollect.

22 MS. SATAGAJ: Objection, form.

23 Q. (By Mr. Freeman) You don't know if it was  
24 deposited in a bank account or not?

25 MS. SATAGAJ: Objection --

17:06:09 1 A. I don't --

2 MS. SATAGAJ: -- form.

3 A. -- recollect.

4 Q. (By Mr. Freeman) Okay. And you don't know if  
5 you receive it directly or from someone else?

6 MS. SATAGAJ: Objection, form.

7 A. I don't recollect.

8 Q. (By Mr. Freeman) Okay. But how do you  
9 know -- how do you have the certainty to sign an  
10 affidavit stating that I received the funds for the  
11 sale of each of these properties prior to divorce?

12 MS. SATAGAJ: Objection, form.

13 A. Yes. The -- we -- I received the funds, and  
14 the funds were already settled on the mediation day,  
17:06:33 15 so --

16 Q. (By Mr. Freeman) Okay. When did you inform  
17 Deepa that you had received these funds?

18 A. I --

19 MS. SATAGAJ: Objection, form.

20 A. I -- I did not directly inform to Deepa. I  
21 informed to my -- my attorney.

22 Q. (By Mr. Freeman) Okay. You also say on each  
23 affidavit, "The property division agreed to at  
24 mediation on July 18th, 2017 included the proceeds  
25 from the sale of these properties. Deepa Adema has

17:07:05 1 already been compensated for her portion of the  
2 interest in these properties by the property division  
3 she agreed to at mediation."

4 Ex- -- explain that. What is your  
5 factual basis for this statement?

6 A. We -- we gave -- factual basis?

7 Q. Uh-huh.

8 A. We gave the documentation on the mediation  
9 day with all the numbers.

10 Q. Okay.

11 A. So that's -- and it was admitted as part of  
12 the inventory documents.

13 Q. Aren't you telling me you don't know what  
14 exactly happened to all these proceeds?

17:07:44 15 MS. SATAGAJ: Objection, form.

16 A. Can you repeat, please?

17 Q. (By Mr. Freeman) Haven't you testified that  
18 you don't know exactly what happened to all of these  
19 proceeds?

20 A. I already told you --

21 MS. SATAGAJ: Objection, form.

22 A. -- that money was invested in the fish and  
23 chicken business. I don't know. You're like  
24 circling, circling, circling, and I -- but the money  
25 which I got, I clearly told that was invested in the



17:08:04 1 fish and chicken business.

2 Q. (By Mr. Freeman) Okay.

3 A. So --

4 Q. But you can't produce any documents to  
5 demonstrate that?

6 A. I already --

7 MS. SATAGAJ: Objection --

8 A. -- gave the documentation.

9 MS. SATAGAJ: -- form.

10 Q. (By Mr. Freeman) And what documentation  
11 specifically, sir?

12 MS. SATAGAJ: Objection, form.

13 A. On mediation day, I produced the documents.

14 Q. (By Mr. Freeman) Okay. And -- and can you  
17:08:22 15 tell me what they are?

16 A. It was a partnership deed.

17 Q. So you produced a partnership deed?

18 A. Yes.

19 Q. Okay. And that reflected all of the  
20 proceeds?

21 A. Yes.

22 Q. And -- and how?

23 A. Whatever the remaining ones, she got settled  
24 here.

25 Q. Okay. And -- and how exactly?

17:08:39 1

MS. SATAGAJ: Objection, form.

2

THE WITNESS: We should look at the

3

document, Jennifer, the document which had all the

4

numbers which she got.

5

A. So that -- that had everything. I mean, I don't remember each and every penny.

7

Q. (By Mr. Freeman) Right.

8

A. But it did -- whatever the, you know leftover money -- after I buy the fish and chicken business, the leftover money was already part of the settlement, and she got in other forms like my 401(k) and all those things.

13

Q. Okay.

14

A. So she was compensated for the remaining -- remaining money.

17:09:11 15

16

Q. (Overtalk)?

17

A. Yes.

18

Q. Okay. Did you disclose it on anything else?

19

MS. SATAGAJ: Objection, form.

20

A. I don't follow your question.

21

Q. (By Mr. Freeman) Did you -- was there any other document that reflected these proceeds?

23

MS. SATAGAJ: Objection, form.

24

A. Yes. In the -- it should be in the inventory appraisalment.

25

17:09:31 1 Q. (By Mr. Freeman) Okay.

2 A. My attorney --

3 Q. She pointed that out in an inventory  
4 appraisement?

5 A. Yeah. My -- my attorney produced to them.

6 Q. Okay. Are you sure your attorney produced  
7 that?

8 A. Yes.

9 MS. SATAGAJ: Objection, form.

10 Q. (By Mr. Freeman) Okay. How do you know that?

11 A. It was --

12 MS. SATAGAJ: Objection, form.

13 A. It was part of the bi- -- the labeling in the  
14 whole case.

17:09:48 15 Q. (By Mr. Freeman) Okay. Which bank accounts  
16 located in India were divided in the divorce decree?

17 A. I don't remember, but whatever the funds were  
18 leftover were divided.

19 Q. Okay.

20 A. I don't -- I don't remember the code number  
21 or anything, but --

22 Q. Okay. Can you tell me about each bank  
23 account you have based in India?

24 A. I don't --

25 MS. SATAGAJ: Objection, form.

17:10:10 1 A. -- remember. It's ICIC Bank account, but I  
2 don't remember the numbers or anything.

3 Q. (By Mr. Freeman) Okay. Do you know how many  
4 you have?

5 MS. SATAGAJ: Objection, form.

6 A. No.

7 Q. (By Mr. Freeman) Does Vectra Infosys have  
8 accounts in India?

9 MS. SATAGAJ: Objection, form.

10 A. No.

11 Q. (By Mr. Freeman) Does Vectra Informatik have  
12 accounts in India?

13 MS. SATAGAJ: Objection, form.

14 A. It's closed now. It used to have, but right  
17:10:27 15 now it's -- it's no longer in operation, so no.

16 Q. (By Mr. Freeman) Okay. But it used to have  
17 accounts in India?

18 MS. SATAGAJ: Objection --

19 A. Yes.

20 MS. SATAGAJ: -- form.

21 Q. (By Mr. Freeman) And how do you know that?

22 MS. SATAGAJ: Objection, form.

23 A. How do I know that?

24 Q. (By Mr. Freeman) Yes, sir.

25 A. It's my dad, right, so --

17:10:40 1 Q. Your dad told you that?

2 A. Yes.

3 Q. Okay. Have you ever used those accounts for  
4 anything?

5 MS. SATAGAJ: Objection --

6 A. No.

7 MS. SATAGAJ: -- form.

8 Q. (By Mr. Freeman) Okay. So it's just based on  
9 what your dad told you?

10 MS. SATAGAJ: Objection, form.

11 A. (No verbal response.)

12 Q. (By Mr. Freeman) Okay. If you will, go back  
13 to Exhibit 18, sir.

14 A. (Witness complies.)

17:10:58 15 Q. Let's go to the third page Bates marked  
16 ADEMA000279.

17 A. Yes.

18 Q. Okay. What is this email?

19 A. I don't recollect about this.

20 Q. You don't?

21 A. Yes.

22 Q. Is that an email to you?

23 A. Looks like. I don't recollect.

24 Q. Is it from Sandeep Adema?

25 MS. SATAGAJ: Objection, form.

17:11:27 1 A. Yes.

2 Q. (By Mr. Freeman) Okay. Do you own either of  
3 the account -- accounts listed there?

4 MS. SATAGAJ: Objection, form.

5 A. Yeah, I don't -- I don't recollect.

6 Q. (By Mr. Freeman) You don't recall if you --

7 A. No.

8 Q. -- owned those?

9 A. Uh-huh.

10 Q. And you don't recall if you ever used those  
11 accounts?

12 A. Yeah --

13 MS. SATAGAJ: Objection, form.

14 A. -- I don't recollect.

17:11:45 15 Q. (By Mr. Freeman) Okay. Do you see the bank  
16 accounts referenced in the document?

17 MS. SATAGAJ: Objection, form.

18 A. Yes. Same number is here.

19 Q. (By Mr. Freeman) Okay. Did you ever transfer  
20 money into either of the accounts listed to purchase  
21 property?

22 MS. SATAGAJ: Objection, form.

23 A. I don't recall.

24 Q. (By Mr. Freeman) Okay. Do you recall which  
25 account you -- you would have transferred money from?

17:12:09 1 A. No.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) No?

4 If you will, look at Exhibit 14, sir.

5 A. Yeah.

6 Q. Do you recognize this document?

7 A. No. It looks like it's a statement.

8 Q. Okay. Is that bank statement?

9 A. Yeah, looks like.

10 Q. ICIC Bank?

11 A. Uh-huh.

12 Q. Okay. Is -- whose it to?

13 A. It's my account.

14 Q. Okay. That's your account?

17:12:48 15 A. Yes.

16 Q. In India?

17 A. Yes.

18 Q. Okay. So that's a bank account that you had

19 in India at ICIC Bank, correct?

20 A. Yes. At one point.

21 Q. Okay. And this document was produced to you

22 nearly a year ago by Ms. Adema; is that correct?

23 A. I mean, I don't remember, but yeah.

24 Q. Okay. Would you agree you've had a

25 reasonable amount of time to review it?

17:13:15 1 MS. SATAGAJ: Objection, form.  
2 A. Yeah. I mean, I did not look at it.  
3 Q. (By Mr. Freeman) Okay.  
4 A. Yeah.  
5 Q. But this bank statement lists you as the  
6 addressee?  
7 A. Yes.  
8 Q. Okay. Were you the owner of this account at  
9 one point?  
10 A. Yes.  
11 Q. What's the date of this document?  
12 A. It looks like 2016.  
13 Q. Okay. End of 2016?  
14 A. Uh-huh.  
17:13:37 15 Q. Okay. Can you read the account number out  
16 for me?  
17 A. Account number? (Inaudible) the account  
18 number. Yeah, I am not finding the account nu- --  
19 yeah, I see that. 059601510397.  
20 Q. Okay. That account number does not appear in  
21 the divorce decree, does it?  
22 MS. SATAGAJ: Objection, form.  
23 A. I -- I don't know.  
24 Q. (By Mr. Freeman) Okay. Do we need to look  
25 through the divorce decree?



17:14:19 1 A. Yeah, sure.

2 Q. Okay. Let's go back to the divorce decree,  
3 if you will, sir.

4 A. Yeah.

5 Q. Does bank account --

6 A. It has zero balance. That could be the  
7 reason it's not --

8 Q. Is that the reason?

9 A. -- displayed.

10 Yes.

11 Q. Okay. So did you still own this account?

12 A. No.

13 Q. When did you stop owning this account?

14 A. A long time back. I don't remember. But,  
17:14:51 15 yeah, I don't know this account.

16 Q. Okay. Why was it not listed, do you think,  
17 in the divorce decree?

18 A. It could be -- you know, it has a zero  
19 balance.

20 Q. Okay. You think it had a zero balance?

21 A. Yeah. I see that at the end it has a zero  
22 balance.

23 Q. Did you ever -- did you ever close this  
24 account?

25 A. Yeah, I closed it. I don't have any accounts

17:15:12 1 now, so apparently I closed it.

2 Q. When did you close it?

3 A. I --

4 MS. SATAGAJ: Objection, form.

5 A. I don't recall.

6 Q. (By Mr. Freeman) Okay. Do you know how you  
7 closed it?

8 A. I don't recall.

9 MS. SATAGAJ: Objection, form.

10 Q. (By Mr. Freeman) Do you have any  
11 documentation to demonstrate that you closed this  
12 account?

13 MS. SATAGAJ: Objection, form.

14 A. I don't have any documentation.

17:15:29 15 Q. (By Mr. Freeman) Okay. What's the most  
16 amount of money that was ever in this account, do you  
17 think?

18 MS. SATAGAJ: Objection, form.

19 A. I don't -- I don't recall.

20 Q. (By Mr. Freeman) You don't -- no idea?

21 A. No idea.

22 Q. \$100,000?

23 A. No idea.

24 Q. No? Nothing?

25 A. Uh-huh.

17:15:42 1 Q. Did you ever disclose this account in the  
2 discovery during the divorce case?

3 MS. SATAGAJ: Objection, form.

4 A. I don't recall.

5 Q. (By Mr. Freeman) Okay. There is a  
6 transaction listed on this bank statement, Exhibit 14.  
7 Indicates there was a transfer to Bhoomanna Chintam.

8 A. Uh-huh.

9 Q. Do you see that at the bottom of the first  
10 page of that statement?

11 A. Yes.

12 Q. A pretty significant transfer of money?

13 A. Uh-huh.

14 Q. Is that a transfer to yourself?

17:16:18 15 A. Looks like, according to this.

16 Q. Right. Is that a transfer to yourself in  
17 another account?

18 A. Looks like, yes.

19 Q. Okay. How much did you transfer to yourself?

20 A. 21,87,862.

21 Q. So 21,000-something --

22 A. Yeah.

23 Q. -- some odd?

24 A. Uh-huh.

25 Q. Okay. What was that money used for?

17:16:38 1 MS. SATAGAJ: Objection, form. Or can we  
2 get clarification? We're talking about rupees --

3 MR. FREEMAN: Oh, okay.

4 MS. SATAGAJ: -- not dollars.

5 So Mr. Chintam, you'll specify the  
6 currency.

7 THE WITNESS: Okay.

8 A. Oh, okay. Yeah, 21,87,862 rupees.

9 Q. (By Mr. Freeman) Okay. What was that money  
10 used for?

11 A. It was --

12 MS. SATAGAJ: Objection, form.

13 A. It was -- yeah, it was settled in the  
14 mediation.

17:17:02 15 Q. (By Mr. Freeman) I mean -- but what was it  
16 used for?

17 A. I --

18 MS. SATAGAJ: Objection, form.

19 A. I don't recall.

20 Q. (By Mr. Freeman) How was it settled in the  
21 mediation?

22 MS. SATAGAJ: Objection, form.

23 A. How was it settled?

24 Q. (By Mr. Freeman) Yes.

25 A. She got -- she got the corresponding money

17:17:12 1 here in dollars.

2 Q. She got the corresponding money here in  
3 Dallas?

4 A. Dollars.

5 MS. SATAGAJ: Objection, form.

6 Q. (By Mr. Freeman) How?

7 MS. SATAGAJ: Objection, form.

8 A. She got bunch of properties, so it was the  
9 settled. The law- -- the mediator settled everything.

10 Q. (By Mr. Freeman) Okay. But I -- I don't  
11 understand. Are you saying because she got something  
12 in the divorce, it somehow accounted for this?

13 A. Yes.

14 MS. SATAGAJ: Objection, form.

17:17:35 15 Q. (By Mr. Freeman) How?

16 MS. SATAGAJ: Objection, form.

17 A. All the numbers were put in, and they -- they  
18 put all the numbers, and they divided, so --

19 Q. (By Mr. Freeman) Where was this number  
20 specifically put in?

21 A. It was --

22 MS. SATAGAJ: Objection, form.

23 A. -- inventory.

24 Q. (By Mr. Freeman) It was in the inventory?

25 A. Yes.

17:17:48 1 Q. Okay.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) Are you sure about that?

4 A. Yes.

5 MS. SATAGAJ: Objection, form.

6 Q. (By Mr. Freeman) Okay. Was any of this money  
7 in this -- in your account, was it used to purchase  
8 property in India?

9 MS. SATAGAJ: Objection, form.

10 A. I don't recollect.

11 Q. (By Mr. Freeman) Did you give any of this  
12 money to anyone?

13 MS. SATAGAJ: Objection, form.

14 A. I don't recollect.

17:18:03 15 Q. (By Mr. Freeman) Okay. And what account  
16 did -- that transfer reflected there, what account did  
17 that go to?

18 A. I don't remember.

19 Q. You don't know?

20 A. Huh-uh.

21 Q. How many other accounts did you have in  
22 India?

23 A. I don't have any now, so --

24 Q. How many did you at the time?

25 MS. SATAGAJ: Objection, form.

17:18:19 1 A. I don't recollect.

2 Q. (By Mr. Freeman) All right. That's a  
3 transfer to Bhoomanna Chintam on December 31st, 2016,  
4 right?

5 A. Yes.

6 MS. SATAGAJ: Objection, form.

7 Q. (By Mr. Freeman) When did you file the  
8 divorce? Was that in February of 2017?

9 A. Yes.

10 Q. Just a little over a month later?

11 A. Yes.

12 Q. Okay. And it looks likes this is a transfer  
13 to another bank account, correct?

14 A. Looks like --

17:18:45 15 MS. SATAGAJ: Objection, form.

16 A. -- yes.

17 Q. (By Mr. Freeman) Yeah. What other bank  
18 account did you have?

19 A. I -- I don't recollect.

20 Q. You don't --

21 A. I had a couple accounts over there, so --

22 Q. You had a couple of other accounts over  
23 there?

24 A. Yeah.

25 Q. Okay. Over in India?

17:18:56 1 A. Yes. I had.  
2 Q. Okay. At -- at that time?  
3 A. Yeah.  
4 Q. Would you look at Exhibit 15?  
5 A. Exhibit 15? Sure.  
6 Q. Okay. What is this document?  
7 A. This is another account number looks like.  
8 Q. Okay. And was this produced to you by  
9 Ms. Adema nearly a year ago?  
10 A. I don't know.  
11 Q. Okay. Have you had some time to review this  
12 document before?  
13 A. Yeah. I -- I -- I mean, I did not review it.  
14 Q. Okay. Is your name listed on this document?  
17:19:34 15 A. Uh-huh, yes.  
16 Q. Does it list you as the addressee?  
17 A. Yes.  
18 Q. And is this a bank statement for another bank  
19 account at ICIC Bank?  
20 A. Yes.  
21 Q. Is it?  
22 A. Uh-huh, yes.  
23 Q. Okay. So were you the owner of this account  
24 at one point?  
25 A. Yes.



17:19:48 1 Q. And what is the date of this document?  
2 A. It's 2016 to 2017.  
3 Q. Okay. So this goes into 2017?  
4 A. Uh-huh.  
5 Q. Looks like -- what's the last date on this  
6 first page? Is that March 31, 2017?  
7 A. Yes.  
8 Q. Okay. So that's during the divorce case,  
9 right?  
10 A. Yes.  
11 Q. Okay. Can you read the account number out  
12 for me?  
13 A. 132001507901.  
14 Q. Okay. That account number doesn't appear in  
17:20:19 15 the divorce decree, does it?  
16 A. I don't know.  
17 Q. Why was it not listed?  
18 A. I -- I don't know.  
19 Q. Okay. Do you still own this account?  
20 A. No.  
21 Q. No?  
22 Why not?  
23 A. I --  
24 MS. SATAGAJ: Objection, form.  
25 A. I don't -- I don't own -- I don't own any

17:20:30 1 accounts now.

2 Q. (By Mr. Freeman) How do you know you don't  
3 own this account?

4 MS. SATAGAJ: Objection, form.

5 A. It's -- it's closed, so I'm not operating it.

6 Q. (By Mr. Freeman) How do you know it's closed?

7 MS. SATAGAJ: Objection, form.

8 A. I closed it.

9 Q. (By Mr. Freeman) When did you close it?

10 A. I don't --

11 MS. SATAGAJ: Objection --

12 A. -- collect.

13 MS. SATAGAJ: -- form.

14 Q. (By Mr. Freeman) How did you close it?

17:20:41 15 MS. SATAGAJ: Objection, form.

16 A. I don't recollect.

17 Q. (By Mr. Freeman) What did you do to close it?

18 MS. SATAGAJ: Objection, form.

19 A. I don't recollect.

20 Q. (By Mr. Freeman) What do you base your  
21 representation that it was closed on?

22 A. I -- I don't recollect, so I --

23 Q. So you don't know if it's open or closed?

24 A. It's closed.

25 Q. You have no personal knowledge of whether you

17:20:59 1 actually closed this?

2 A. She can prove if it is open, but it is  
3 closed.

4 Q. Okay.

5 A. So --

6 Q. But wouldn't it seem like it'd be a lot  
7 easier for you to demonstrate that it's closed?

8 A. Yeah. I --

9 MS. SATAGAJ: Objection, form.

10 A. I have no documentation.

11 Q. (By Mr. Freeman) Okay.

12 A. Yeah.

13 Q. So does that mean it's still open?

14 MS. SATAGAJ: Objection, form.

17:21:14 15 A. It's closed.

16 Q. (By Mr. Freeman) Okay. So -- but you  
17 don't -- you don't remember when, how, where, by what  
18 means you closed it?

19 A. I don't recollect, yeah --

20 Q. You can't recollect at all?

21 A. -- about that, yeah.

22 Q. Did this account -- is this the account that  
23 received the transfer from the other account we were  
24 just talking about?

25 A. Yes, looks like.

17:21:31 1 Q. Okay. Did you disclose this account in  
2 discovery during the divorce case?

3 MS. SATAGAJ: Objection --

4 A. I --

5 MS. SATAGAJ: -- form.

6 A. I don't recollect.

7 Q. (By Mr. Freeman) Okay. But you said this is  
8 the account that received the transfer from the other  
9 Indian account that we were just discussing?

10 A. Yeah. Look like --

11 Q. That --

12 A. -- that number matches.

13 Q. And how much was that for?

14 A. The same number, looks like 21,86,862.

17:21:52 15 Q. Okay. And what was that money used for?

16 A. I don't recollect.

17 Q. Was it to purchase property in India?

18 A. Yeah, I -- I don't recollect.

19 Q. Who did you give it to?

20 MS. SATAGAJ: Objection, form.

21 A. I don't recollect.

22 Q. (By Mr. Freeman) What happened to it?

23 A. I --

24 MS. SATAGAJ: Objection, form.

25 A. -- don't recollect.

17:22:04 1 Q. (By Mr. Freeman) Okay. Let's go down to Page  
2 2.  
3 A. (Witness complies.)  
4 Q. Is there a transfer there of 15,170.81?  
5 A. Yes.  
6 Q. Okay. What -- what is that for?  
7 A. I don't recollect.  
8 Q. Okay. Is that from an account 08050 --  
9 A. Yes.  
10 Q. -- to -- to account 08022?  
11 MS. SATAGAJ: Objection, form.  
12 A. Yes.  
13 Q. (By Mr. Freeman) Yeah, what account is that?  
14 A. I don't recollect.  
17:22:32 15 MS. SATAGAJ: Objection, form.  
16 Q. (By Mr. Freeman) Okay. You don't know what  
17 that is?  
18 A. No.  
19 Q. Is that another Indian account that you had?  
20 A. Yeah, I. --  
21 MS. SATAGAJ: Objection, form.  
22 A. I don't recollect.  
23 Q. (By Mr. Freeman) You don't recall?  
24 A. Yeah.  
25 Q. So you don't know if that's maybe another

17:22:41 1 bank account that you had?

2 A. Yeah, I don't know.

3 Q. Okay. But was that a transfer in 2017?

4 MS. SATAGAJ: Objection, form.

5 A. Yes.

6 Q. (By Mr. Freeman) Okay. On Page 1, if you go  
7 back up, there was an initial funding of 25,000?

8 A. Yes.

9 Q. Where did that come from?

10 MS. SATAGAJ: Objection, form.

11 A. I don't recollect.

12 Q. (By Mr. Freeman) You don't recall at all?

13 A. No.

14 Q. Do you have documentation on that transfer?

17:23:06 15 A. No.

16 MS. SATAGAJ: Objection, form.

17 Q. (By Mr. Freeman) No?

18 So as we sit here today, you don't know  
19 what that 25,000 in your bank account is related to?

20 A. Yes.

21 MS. SATAGAJ: Objection, form.

22 Q. (By Mr. Freeman) Okay.

23 MS. SATAGAJ: Mr. Freeman? I'm sorry.

24 MR. FREEMAN: Yeah.

25 MS. SATAGAJ: Which -- what was the

17:23:22 1 number you were just referring to? Which page?

2 MR. FREEMAN: Page 1, ADEMA00061.

3 MS. SATAGAJ: Okay. So that was the --  
4 the initial funding of the 25,000 rupees?

5 MR. FREEMAN: Yes, ma'am.

6 MS. SATAGAJ: Thank you.

7 Q. (By Mr. Freeman) If you'll look at the last  
8 line on Page 1.

9 A. (Witness complies.)

10 Q. Is this a deposit of 15,090?

11 A. Yes.

12 Q. And it references interest paid, 12/30/2016  
13 to 3/30/2017. What is that for?

14 MS. SATAGAJ: Objection, form.

17:23:55 15 A. I don't -- I don't know.

16 Q. (By Mr. Freeman) Who's paying that?

17 MS. SATAGAJ: Objection, form.

18 A. I don't know.

19 Q. (By Mr. Freeman) Why are they paying that?

20 MS. SATAGAJ: Objection, form.

21 A. I don't know.

22 Q. (By Mr. Freeman) Why are they paying that?

23 MS. SATAGAJ: Objection, form.

24 A. I don't know.

25 Q. (By Mr. Freeman) Why -- what are these other

17:24:03 1 transactions listed?

2 MS. SATAGAJ: Objection, form.

3 A. I don't recollect.

4 Q. (By Mr. Freeman) No?

5 Are any of them related to properties?

6 MS. SATAGAJ: Objection, form.

7 A. I don't know.

8 Q. (By Mr. Freeman) Why are you depositing all  
9 this cash?

10 MS. SATAGAJ: Objection, form.

11 A. I -- I don't recollect.

12 Q. (By Mr. Freeman) Are you paying for  
13 properties in cash?

14 MS. SATAGAJ: Objection, form.

17:24:17 15 A. I -- I don't recollect.

16 Q. (By Mr. Freeman) Mostly cash?

17 MS. SATAGAJ: Objection, form.

18 A. Yeah, I don't recollect.

19 Q. (By Mr. Freeman) Any cash?

20 MS. SATAGAJ: Objection, form.

21 A. No.

22 Q. (By Mr. Freeman) Okay. It looks like Vish  
23 Palepu withdraws 50,000; is that correct?

24 MS. SATAGAJ: Objection, form.

25 A. I see it, yes.



17:24:32 1 Q. (By Mr. Freeman) Yeah? Who is Vish Palepu?  
2 MS. SATAGAJ: Objection, form.  
3 A. I don't know.  
4 Q. (By Mr. Freeman) You don't know who Vish  
5 Palepu is?  
6 A. I don't know.  
7 Q. Is he actually your CPA in the United States?  
8 A. I don't know --  
9 MS. SATAGAJ: Objection, form.  
10 A. -- he's the same person or somebody else.  
11 Q. (By Mr. Freeman) Okay. How many Vish Palepus  
12 did you have withdrawing \$50,000 from your bank  
13 account?  
14 A. I don't --  
17:24:52 15 MS. SATAGAJ: Objection, form.  
16 A. -- recollect.  
17 Q. (By Mr. Freeman) You don't know?  
18 A. I don't know.  
19 Q. No?  
20 A. No.  
21 Q. So you think this might be some other Vish  
22 Palepu?  
23 A. Yes.  
24 MS. SATAGAJ: Objection, form.  
25 A. I don't know.

17:24:58 1 Q. (By Mr. Freeman) Do you know a lot of Vish  
2 Palepus?  
3 A. Yes.  
4 MS. SATAGAJ: Objection, form.  
5 Q. (By Mr. Freeman) How many?  
6 A. I don't know.  
7 Q. You don't know?  
8 A. Yeah.  
9 Q. No?  
10 MR. FREEMAN: Objection, form.  
11 A. No idea.  
12 Q. (By Mr. Freeman) But it's a lot?  
13 A. Yes.  
14 THE REPORTER: One at a time, guys.  
17:25:15 15 MR. FREEMAN: Are we --  
16 MS. SATAGAJ: I just --  
17 MR. FREEMAN: Form?  
18 MS. SATAGAJ: Yeah.  
19 Q. (By Mr. Freeman) Is -- how many Vish Palepus  
20 do you know?  
21 A. I don't know.  
22 MS. SATAGAJ: Objecti- --  
23 Q. (By Mr. Freeman) Five?  
24 A. I don't --  
25 MS. SATAGAJ: Objection, form.

17:25:20 1 A. I don't know the number.  
2 Q. (By Mr. Freeman) Ten?  
3 MS. SATAGAJ: Objection, form.  
4 A. No.  
5 Q. (By Mr. Freeman) Twenty?  
6 A. I don't know.  
7 MS. SATAGAJ: Objection, form.  
8 Q. (By Mr. Freeman) Thirty?  
9 MS. SATAGAJ: Objection, form.  
10 A. It's nothing to do with it, so I don't know.  
11 Q. (By Mr. Freeman) Do you know a hundred Vish  
12 Palepus?  
13 A. I don't know.  
14 MS. SATAGAJ: Objection, form.  
17:25:34 15 Q. (By Mr. Freeman) Well, let's get to like a  
16 meaningful number. Can you -- can you give me any  
17 idea?  
18 A. No.  
19 Q. (By Mr. Freeman) No?  
20 MS. SATAGAJ: Objection, form.  
21 Q. (By Mr. Freeman) Okay. But a Vish Palepu  
22 withdraws 50,000 from your Indian account here?  
23 A. Yes.  
24 Q. And this account wasn't disclosed in the  
25 divorce, right?

17:25:48 1 A. I don't know.

2 Q. Right? But there's transactions there taking  
3 place well after you filed for divorce, right?

4 MS. SATAGAJ: Objection, form.

5 A. Yes.

6 Q. (By Mr. Freeman) Okay. Who is Vish Palepu?

7 MS. SATAGAJ: Objection, form.

8 A. I don't know.

9 Q. (By Mr. Freeman) Did he help you with any of  
10 the properties?

11 MS. SATAGAJ: Objection, form.

12 A. No.

13 Q. (By Mr. Freeman) What about accounting?

14 MS. SATAGAJ: Objection, form.

17:26:07 15 A. He hel- -- he -- you ask, he helps.

16 Q. (By Mr. Freeman) Okay. So the Vish Palepu  
17 that took this money here, he helped you with your  
18 U.S. accounting?

19 A. I don't know.

20 MS. SATAGAJ: Objection, form.

21 A. I don't recollect.

22 Q. (By Mr. Freeman) Did he handle your money?

23 MS. SATAGAJ: Objection, form.

24 A. No.

25 Q. (By Mr. Freeman) Okay. Vish Palepu, you --

17:26:22 1 you mentioned earlier that he did not have -- he  
2 didn't do anything for you in India, correct?

3 A. Yes.

4 MS. SATAGAJ: Objection, form.

5 Q. (By Mr. Freeman) Is that correct?

6 A. That's correct.

7 MS. SATAGAJ: Objection --

8 Q. (By Mr. Freeman) He didn't do anything?

9 A. That's correct.

10 MS. SATAGAJ: Objection, form.

11 Q. (By Mr. Freeman) Okay. Why does he have  
12 access to this account?

13 MS. SATAGAJ: Objection, form.

14 A. I -- I -- I don't recollect.

17:26:43 15 Q. (By Mr. Freeman) Okay. And what was this  
16 50,000 for, do you recollect?

17 A. No.

18 MS. SATAGAJ: Objection, form.

19 Q. (By Mr. Freeman) Was it related to any of the  
20 properties?

21 MS. SATAGAJ: Objection, form.

22 A. I don't recollect.

23 Q. (By Mr. Freeman) You also transfer yourself  
24 an -- another 21,87,862; is that correct?

25 MS. SATAGAJ: Objection, form.

17:27:07 1 A. I -- I don't know. Which one you're  
2 talking -- which page are you talking?  
3 Q. (By Mr. Freeman) Look at that right under the  
4 initial funding.  
5 A. Uh-huh.  
6 Q. 21- --  
7 A. Yes.  
8 Q. -- -87,862?  
9 A. Yes.  
10 Q. What's that for?  
11 MS. SATAGAJ: Objection, form.  
12 A. I don't recollect.  
13 Q. (By Mr. Freeman) Okay. And what account is  
14 being transferred from?  
17:27:23 15 MS. SATAGAJ: Objection, form.  
16 A. I don't know.  
17 Q. (By Mr. Freeman) You don't know which  
18 account --  
19 A. No.  
20 Q. -- that is?  
21 Did you --  
22 A. It was from earlier account, it looks like.  
23 Q. Are you sure?  
24 MS. SATAGAJ: Objection --  
25 A. Yeah.

17:27:31 1 MS. SATAGAJ: -- form.

2 A. The -- the same number, it matches, right?

3 Q. (By Mr. Freeman) Okay. The same account that  
4 you didn't disclose in the divorce?

5 A. I --

6 MS. SATAGAJ: Objection, form.

7 A. That -- that -- that account has zero  
8 balance. I guess that was -- that could be the reason  
9 why it was not disclosed.

10 Q. (By Mr. Freeman) Okay. Was that account  
11 split in the divorce?

12 MS. SATAGAJ: Objection, form.

13 A. Yes.

14 Q. (By Mr. Freeman) Was it?

17:27:48 15 A. Yes.

16 Q. But you just said it wasn't disclosed.

17 A. Yeah, zero is not disclosed, but that amount  
18 was disclosed and settled.

19 Q. Okay. Are you asking me to get into a debate  
20 about whether you split an account that wasn't  
21 disclosed that you maintain had zero dollars in it?

22 MS. SATAGAJ: Objection. I'm instructing  
23 the witness not to answer because it's a misleading  
24 and confusing question.

25 Q. (By Mr. Freeman) Did the -- the money -- the

17:28:14 1 money reflected here in Exhibit 15, did any of that  
2 money go towards purchasing property?

3 MS. SATAGAJ: Objection, form.

4 A. I don't recollect.

5 Q. (By Mr. Freeman) You just don't recall?

6 Okay. Would you look at Exhibit 17?

7 A. Yes.

8 Q. Does this document show payment details  
9 from -- from the bank for this particular property?

10 A. Where is it? Which -- which -- which number  
11 you are talking? One second.

12 Q. Just take a look at the document.

13 May askI what you're -- you're doing,  
14 sir?

17:28:50 15 A. I know. I know. Sorry, I'm putting it in  
16 flight mode.

17 Yeah. Yeah, can you please repeat?

18 Q. Sure.

19 Does this document -- and -- and take a  
20 minute to -- to scan through it. Does it reflect  
21 payment details from the bank for this -- this  
22 property?

23 A. Which page number you are talking?

24 Q. I just want you to review the document,  
25 please.



17:29:31 1 A. Yeah, I don't find what you are talking.

2 Q. Nothing.

3 A. Yeah, I don't find it.

4 Q. Okay. Do you know whether -- do you know how  
5 this was -- was paid for?

6 MS. SATAGAJ: Objection, form.

7 A. Yeah, I don't recollect.

8 Q. (By Mr. Freeman) You don't?

9 A. Yeah.

10 Q. What property does this document deal with?

11 A. Miyapur.

12 Q. Is this the Miyapur --

13 A. Yes.

14 Q. -- property --

17:30:09 15 A. Yes.

16 Q. -- that's at issue in this case?

17 A. Yes.

18 Q. Okay. Okay. If you will look to Exhibit  
19 24.

20 A. (Witness complies.)

21 Q. Do you recognize that document, sir?

22 MS. SATAGAJ: Objection, form.

23 A. No, I don't recollect.

24 Q. (By Mr. Freeman) Okay. You don't recognize  
25 that email?

17:30:46 1 A. Yes.

2 MS. SATAGAJ: Objection, form.

3 Q. (By Mr. Freeman) Let's pull it up. Is that  
4 an email, sir?

5 A. Yeah. By looking at it, it's an email.

6 Q. Is it an email from you?

7 A. Yeah.

8 MS. SATAGAJ: Objection, form.

9 A. I -- I -- I mean, I don't recollect sending  
10 these emails.

11 Q. (By Mr. Freeman) You don't recollect it?

12 A. No.

13 Q. Does it look like to you?

14 A. Yes.

17:31:20 15 MS. SATAGAJ: Objection, form.

16 Q. (By Mr. Freeman) Does it say that it's from  
17 bonibobj@gmail.com?

18 A. Yes.

19 MS. SATAGAJ: Objection, form.

20 Q. (By Mr. Freeman) Is that your email address?

21 A. Yes.

22 Q. And was this to Deepa Chintam, Sai Adema and  
23 several other persons?

24 MS. SATAGAJ: Objection, form.

25 A. Yes.

17:31:38 1 Q. (By Mr. Freeman) And does it reflect that it  
2 was sent on August 10th, 2015?

3 MS. SATAGAJ: Objection, form.

4 A. That's what it says, but I don't recollect --

5 Q. (By Mr. Freeman) Okay.

6 A. -- anything about this email.

7 Q. Okay. And the -- the email right below that,  
8 is that an email from -- from someone named Immanneni  
9 Venkateswara?

10 A. Yeah. That's what it says, but I don't -- I  
11 don't recollect anything about this email.

12 Q. Okay. Are -- did you -- does it reflect that  
13 it was sent to bonibobj@gmail.com?

14 MS. SATAGAJ: Objection, form.

17:32:13 15 A. Yes, that's that it says. But I don't  
16 recollect.

17 Q. (By Mr. Freeman) Okay. And does it refer to  
18 a Satish Reddy?

19 MS. SATAGAJ: Objection, form.

20 A. That's what it says.

21 Q. (By Mr. Freeman) Okay. What is this email  
22 talking about?

23 MS. SATAGAJ: Objection, form.

24 A. Yeah, I have no idea about this email.

25 Q. (By Mr. Freeman) No idea?

17:32:27 1 A. Yes.

2 Q. Okay. Does it reflect that you are supposed  
3 to send some money to Satish Reddy?

4 MS. SATAGAJ: Objection, form.

5 A. I don't recollect.

6 Q. (By Mr. Freeman) No?

7 A. No.

8 Q. Did Satish Reddy help you with any particular  
9 properties?

10 A. I don't recollect.

11 Q. Was this money for a property?

12 MS. SATAGAJ: Objection, form.

13 A. I don't recollect -- recall.

14 Q. (By Mr. Freeman) Did you send money to that  
17:32:47 15 account?

16 MS. SATAGAJ: Objection, form.

17 A. I don't recall.

18 Q. (By Mr. Freeman) Okay. Do you know where you  
19 would have sent it from?

20 MS. SATAGAJ: Objection, form.

21 A. I don't recall.

22 Q. (By Mr. Freeman) Okay. Which account, don't  
23 know?

24 MS. SATAGAJ: Objection --

25 A. No.

17:32:59 1 MS. SATAGAJ: -- form.

2 Q. (By Mr. Freeman) Okay. If you would, look at

3 Exhibit 26.

4 A. Yeah.

5 Q. (By Mr. Freeman) Okay. Just a second here.

6 Do you see that document?

7 A. Yes.

8 Q. Okay. And do you recognize that document?

9 MS. SATAGAJ: Objection, form.

10 A. No, I don't recognize.

11 Q. (By Mr. Freeman) Do you know what -- what

12 transfer is reflected in this document?

13 MS. SATAGAJ: Objection, form.

14 A. No.

17:33:33 15 Q. (By Mr. Freeman) No?

16 Do you know what account Sandeep

17 transferred out of?

18 MS. SATAGAJ: Objection, form.

19 A. No.

20 Q. (By Mr. Freeman) Or which property this was

21 related to?

22 MS. SATAGAJ: Objection, form.

23 A. No.

24 Q. (By Mr. Freeman) Does it mention a mortgage?

25 MS. SATAGAJ: Objection, form.

17:33:47 1 A. Yeah, I --

2 Q. (By Mr. Freeman) Does --

3 A. -- don't recollect, yeah.

4 Q. Okay.

5 A. Yeah.

6 Q. And this is an email correspondence between  
7 Sandeep Adema and you, bonibobj@gmail.com; is that  
8 correct?

9 MS. SATAGAJ: Objection, form.

10 A. Yeah, I don't recollect anything about this.

11 Q. (By Mr. Freeman) Okay. And there's an ICIC  
12 Bank account listing there; is that correct?

13 MS. SATAGAJ: Objection, form.

14 A. Yeah. Some transection is there.

17:34:11 15 Q. (By Mr. Freeman) Right. And it mentions a  
16 mortgage?

17 MS. SATAGAJ: Objection, form.

18 A. Yes, yes.

19 Q. (By Mr. Freeman) Right. Does that indicate  
20 that there was a property?

21 MS. SATAGAJ: Objection, form.

22 A. Yes. I -- I don't know what is this about.  
23 I don't recollect --

24 Q. (By Mr. Freeman) Does --

25 A. -- anything.

17:34:27 1 Q. Does there appear to be an account there  
2 that's in Sandeep's name?

3 MS. SATAGAJ: Objection, form.

4 A. Yeah, I don't know.

5 Q. (By Mr. Freeman) Why is that? Any idea?

6 A. No idea.

7 MS. SATAGAJ: Objection, form.

8 Q. (By Mr. Freeman) Is that his personal  
9 account?

10 MS. SATAGAJ: Objection, form.

11 A. No idea.

12 Q. (By Mr. Freeman) Any idea why he would be  
13 transferring funds out of his personal account for  
14 your property?

17:34:44 15 MS. SATAGAJ: Objection, form.

16 A. No idea.

17 Q. (By Mr. Freeman) Did you direct him to use  
18 this account?

19 MS. SATAGAJ: Objection, form.

20 A. No idea.

21 Q. (By Mr. Freeman) Who's Mr. Vamshee?

22 MS. SATAGAJ: Objection, form.

23 A. I don't know. I don't recollect.

24 Q. (By Mr. Freeman) Okay. If you will, look at  
25 Exhibit 27. What is this document, sir?

17:35:12 1 A. I have no idea --  
2 Q. No idea?  
3 A. -- about this document.  
4 Yeah.  
5 Q. Are you listed on this document?  
6 MS. SATAGAJ: Objection, form.  
7 A. Yes, it's -- my name is there. My ex-wife  
8 name is there.  
9 Q. (By Mr. Freeman) Uh-huh. Is it addressed to  
10 you?  
11 A. It's addressed --  
12 MS. SATAGAJ: Objection, form.  
13 A. -- to both of -- both of us.  
14 Q. (By Mr. Freeman) Okay. Is it a loan?  
17:35:29 15 MS. SATAGAJ: Objection, form.  
16 A. I have no idea what is this thing.  
17 Q. (By Mr. Freeman) No idea?  
18 A. Yeah.  
19 Q. True that you have no idea?  
20 A. Yeah, I --  
21 Q. That is --  
22 A. -- don't recollect.  
23 Q. That is your best answer?  
24 A. Yes.  
25 Q. Okay. Do you know what property it was



17:35:40 1 related to?

2 MS. SATAGAJ: Objection, form.

3 A. No, I don't recollect.

4 Q. (By Mr. Freeman) Is it an offer letter?

5 MS. SATAGAJ: Objection, form.

6 A. I don't know.

7 Q. (By Mr. Freeman) You don't know?

8 A. Uh-huh.

9 Q. And you don't know what property it's for?

10 A. No, I don't know.

11 Q. Okay. Did Deepa have an ownership interest  
12 in this property?

13 MS. SATAGAJ: Objection, form.

14 A. I -- I don't recollect what is this about,

17:36:02 15 so --

16 Q. (By Mr. Freeman) Okay.

17 MR. FREEMAN: If we could go off the  
18 record for just a bit.

19 THE VIDEOGRAPHER: We're off the record  
20 at 5:35 p.m.

21 (Break from 5:35 p.m. to 5:48 p.m.)

22 THE VIDEOGRAPHER: We're back on the  
23 record at 5:48 p.m.

24 Q. (By Mr. Freeman) Mr. Adema, we're getting  
25 close to the end here. I appreciate your patience, If

17:49:19 1 you would --

2 MS. SATAGAJ: Mr. Chintam.

3 A. Mr. Chintam.

4 Q. (By Mr. Freeman) Mr. Chintam, excuse me.

5 A. That's okay. It must be (inaudible).

6 Q. It has been a long day. For the record, I do  
7 represent a client here named Adema. Y'all did used  
8 to be married, but your name is clearly Mr. Chintam  
9 and has never been Adema --

10 A. Yes.

11 Q. -- correct?

12 A. Yes, sir. Absolutely, yeah.

13 Q. (Overtalk.)

14 Is -- if you would, please look at

17:49:43 15 Exhibit 17?

16 A. Yes.

17 Q. And we looked at this document a little bit  
18 earlier. It's, I believe, related to the Miyapur  
19 property.

20 A. One second.

21 Yes.

22 Q. Okay. And if you'll look at the sixth page  
23 of that exhibit, and it's -- at the bottom, it's ADEMA  
24 145.

25 A. 145, yes.

17:50:17 1 Q. Okay. Now, there's payment -- it appears to  
2 be payment information reflected in that -- in that  
3 box towards the top.

4 A. Yes.

5 Q. And there's an item there that reflects an  
6 amount paid, and it reflects -- appears to reflect  
7 rupees 688800?

8 A. Yes.

9 Q. The date is March 27th, 2017. Does that  
10 appear to be correct?

11 A. Yes.

12 Q. Okay. And there's a bank name co- -- or it  
13 says, Bank name: SBH, Branch name: Sanathnagar --

14 A. Yes.

17:51:02 15 Q. -- Hyderabad?

16 A. Uh-huh.

17 Q. And there's a bank reference number and a  
18 remitter name?

19 A. Yes.

20 Q. Okay. Do you see that?

21 A. (No verbal response.)

22 Q. And the remitter name is Appala Rajanna, and  
23 it says the executant name, Chintam Bhoomanna;  
24 claimant -- claimant name, Appala Rajanna; is --

25 A. Ye- --

17:51:23 1 Q. -- that correct?

2 A. Yes.

3 Q. Do you know what bank that is?

4 A. Bank? I don't know which bank name this one.  
5 I don't see a bank name here.

6 Q. Okay. Do you know why it lists you as the  
7 executant?

8 A. I think it is -- you know, it -- it has a  
9 seller name and buyer name, it looks like.

10 Q. Okay. Is that why the remitter is listed as  
11 Appala Rajanna?

12 A. Yes, looks like.

13 Q. Okay. But why is the executant name listed  
14 your name?

17:52:01 15 A. I don't know, honestly.

16 Q. And do you know --

17 A. It could be -- it could be because I'm  
18 selling him the property.

19 Q. Okay. Do you know whose -- whose signatures  
20 are on this page?

21 A. I have no idea.

22 Q. Okay. Was this bank account disclosed in the  
23 divorce?

24 A. I don't even know which bank -- which bank  
25 account is this one.

17:52:29 1 Q. Okay.

2 A. So this -- normally, any -- for any property  
3 seller is buying, it's a seller respo- -- sorry, it's  
4 buyer's responsibility to pay the sales tax, so it's  
5 like a sales tax.

6 Q. Okay. But why would --

7 A. Stamp duty.

8 Q. Why would it state here the executant  
9 name and provide your --

10 A. I think because I was the seller.

11 Q. Okay. If you will, go to the 17th page of  
12 this document, and the Bates label is ADEMA 156.

13 A. 156? Okay. Yes.

14 Q. Okay. What is this?

17:53:22 15 A. This is Commissioner GHMC.

16 Q. Okay.

17 (Reporter clarification.)

18 Q. (By Mr. Freeman) Okay. And is this a check?

19 A. This looks like a -- I'm not sure if it's a  
20 check or demand draft.

21 Q. Okay. Is this like a cashier's check?

22 A. Yeah, maybe. I don't know, so --

23 Q. Is -- is it made out by Appala Rajanna?

24 A. That's what it says.

25 Q. Why is that?

17:53:57 1 A. I -- I mean, he was buying the property, so I  
2 guess he was paying taxes to the government.

3 Q. Is that what you think this is for?

4 A. Yes.

5 Q. Whose signatures are on this document?

6 A. I have no idea.

7 MS. SATAGAJ: Objection, form.

8 Q. (By Mr. Freeman) You don't know whose those  
9 are?

10 A. Yeah, no idea.

11 Q. Do you know where this money -- this money  
12 originally came from?

13 MS. SATAGAJ: Objection, form.

14 A. I did not pay, so I don't know.

17:54:21 15 Q. (By Mr. Freeman) Okay.

16 A. Yeah.

17 Q. Did you get married after the divorce?

18 A. Yes.

19 Q. And what is your wife's name?

20 MS. SATAGAJ: Objection, form.

21 A. Naga Jyodhi.

22 Q. (By Mr. Freeman) Okay. And --

23 THE REPORTER: Can we spell that?

24 THE WITNESS: Naga, N-a-g-a, Naga.

25 Jyodhi, J-y-o-d-h-i.

17:54:42 1 Q. (By Mr. Freeman) Okay. Do y'all have any  
2 children?

3 A. Yes.

4 Q. How many?

5 A. Two.

6 Q. What does she do for a living?

7 MS. SATAGAJ: Objection, form.

8 A. She's a homemaker.

9 Q. (By Mr. Freeman) Homemaker?

10 A. Yes.

11 Q. Does she do anything else?

12 MS. SATAGAJ: Objection, form.

13 A. No.

14 Q. (By Mr. Freeman) Has she ever?

17:54:59 15 MS. SATAGAJ: Objection, form.

16 A. No.

17 Q. (By Mr. Freeman) Do you provide all of the  
18 support for the family unit?

19 MS. SATAGAJ: Objection, form.

20 A. Yes.

21 Q. (By Mr. Freeman) Okay. And have you at all  
22 times since y'all have been married?

23 A. Yes.

24 MS. SATAGAJ: Objection --

25 A. Yes.

17:55:10 1 MS. SATAGAJ: -- form.  
2 Q. (By Mr. Freeman) Does she own a business?  
3 MS. SATAGAJ: Objection, form.  
4 A. Yes.  
5 Q. (By Mr. Freeman) Okay. What business?  
6 MS. SATAGAJ: Objection, form.  
7 A. Quad IT.  
8 Q. (By Mr. Freeman) Quad IT?  
9 A. Yes.  
10 Q. Okay. Did you used to own that business?  
11 A. Yes.  
12 Q. And did you transfer it to her name?  
13 MS. SATAGAJ: Objection, form.  
14 A. Yes.  
17:55:26 15 Q. (By Mr. Freeman) Okay. Why?  
16 MS. SATAGAJ: Objection, form.  
17 A. Yeah, there's no reason.  
18 Q. (By Mr. Freeman) No reason?  
19 A. Yes.  
20 Q. You just referred it?  
21 A. Yes.  
22 Q. Okay. When did you do that?  
23 MS. SATAGAJ: Objection, form.  
24 A. I don't remember.  
25 Q. (By Mr. Freeman) Okay.



17:55:38 1 A. A few years back, yeah.  
2 Q. Do you know how you did it?  
3 MS. SATAGAJ: Objection, form.  
4 A. I don't recollect. My CPA did.  
5 Q. (By Mr. Freeman) Your CPA did it?  
6 A. Yes.  
7 Q. Is that Vish Palepu?  
8 A. Yes.  
9 MS. SATAGAJ: Objection, form.  
10 Q. (By Mr. Freeman) Okay. But there was no  
11 particular reason for it?  
12 MS. SATAGAJ: Objection, form.  
13 A. That's correct.  
14 Q. (By Mr. Freeman) Okay. Have you transferred  
17:55:54 15 any other businesses?  
16 MS. SATAGAJ: Objection, form.  
17 A. No.  
18 Q. (By Mr. Freeman) Have you put any businesses  
19 in her name?  
20 MS. SATAGAJ: Objection --  
21 A. No.  
22 MS. SATAGAJ: -- form.  
23 Q. (By Mr. Freeman) What is Quad IT?  
24 MS. SATAGAJ: Objection, form.  
25 A. It's a staffing company.

17:56:11 1 Q. (By Mr. Freeman) Okay. What does it do?

2 MS. SATAGAJ: Objection, form.

3 A. Place people.

4 Q. (By Mr. Freeman) Okay. Is it -- how is it  
5 different from Vectra?

6 MS. SATAGAJ: Objection, form.

7 A. Same.

8 Q. (By Mr. Freeman) Same as Vectra?

9 A. Yes.

10 Q. I mean, like exact same or --

11 A. Yeah.

12 Q. Okay. Like different customers or basically  
13 the same?

14 A. It's all the same, yeah.

17:56:31 15 MS. SATAGAJ: Objection, form.

16 Q. (By Mr. Freeman) Okay. Is -- why did you  
17 form it?

18 MS. SATAGAJ: Objection, form.

19 A. No reason.

20 Q. (By Mr. Freeman) Okay. Just to have another  
21 company?

22 A. That's it, yeah.

23 Q. Okay. But it basically did exactly the same  
24 thing -- or does exactly the same thing as Vectra?

25 MS. SATAGAJ: Objection, form.

17:56:52 1 A. Yes.

2 Q. (By Mr. Freeman) Okay. Has Quad IT ever sent  
3 money to India?

4 MS. SATAGAJ: Objection, form.

5 A. No.

6 Q. (By Mr. Freeman) Do you have any role at --  
7 at Quad IT?

8 MS. SATAGAJ: Objection, form.

9 A. Yes.

10 Q. (By Mr. Freeman) What is your role?

11 MS. SATAGAJ: Objection, form.

12 A. I just help.

13 Q. (By Mr. Freeman) Okay. Do -- do you actually  
14 control that company?

17:57:13 15 MS. SATAGAJ: Objection, form.

16 A. No.

17 Q. (By Mr. Freeman) No?

18 Okay. Mr. Chintam, I appreciate your  
19 patience today. I know it's been a long day. It has  
20 for all of us. I believe at this point that I have --  
21 that I will be passing you as a wit- -- I will be  
22 passing you as a witness, and I don't know if you'll  
23 have any additional questions, but I have a feeling  
24 you're maybe about to get out of here.

25 A. Oh, I just want to get out of here

17:57:45 1 absolutely.

2 (Time 5:57 p.m.)

3 EXAMINATION

4 BY MS. SATAGAJ:

5 Q. Mr. -- briefly, Mr. Chintam, we spoke earlier  
6 in the records, what is the currency in India?

7 A. One dollar is like 72 rupees. Are you  
8 wanting the divorce? Let me -- let me do the --

9 Q. No, that's okay. You don't have to look  
10 anything up.

11 A. It's like maybe 0.011 or 0.015.

12 Q. Okay. So --

13 A. One rupee, two dollar.

14 Q. Okay.

17:58:16 15 A. It's like less than one cent. 0. -- one  
16 second. (Inaudible.)

17 0.013.

18 Q. Okay. Has the conversion from rupees to  
19 dollars been less than .02 since the divorce?

20 A. I can look at that. (Inaudible) U.S. 2017.  
21 2017, 2017. Yeah, it was 0.0157 in 2017.

22 Q. Okay.

23 A. Now it is 0.013.

24 Q. Okay.

25 MS. SATAGAJ: Pass the witness.

17:59:24 1 MR. FREEMAN: I have no further  
2 questions.

3 THE VIDEOGRAPHER: We're off -- we're  
4 record at 5:58 p.m.

5 (Deposition adjourned at 5:58 p.m.)

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1 CHANGES AND SIGNATURE

2 WITNESS NAME: BHOOMANA CHINTAM APRIL 9, 2021

3 PAGE LINE CHANGE REASON

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1 I, BHOOMANA CHINTAM, have read the  
2 foregoing deposition and hereby affix my signature  
3 that same is true and correct, except as noted above.

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\_\_\_\_\_  
BHOOMANA CHINTAM

6

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9 THE STATE OF \_\_\_\_\_)

10 COUNTY OF \_\_\_\_\_)

11 Before me, \_\_\_\_\_, on

12 this day personally appeared BHOOMANA CHINTAM, known

13 to me (or proved to me under oath or through

14 \_\_\_\_\_) (description of identity card or

15 other document) to be the person whose name is

16 subscribed to the foregoing instrument and

17 acknowledged to me that they executed the same for the

18 purposes and consideration therein expressed.

19 Given under my hand and seal of office

20 this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

21

22

23

\_\_\_\_\_  
NOTARY PUBLIC IN AND FOR  
THE STATE OF \_\_\_\_\_

24

My commission expires: \_\_\_\_\_

25

1 NO. DF-19-15178

2 DEEPA CHINTAM A/K/A DEEPA § IN THE DISTRICT COURT  
 ADEMA, §  
 3 §  
 Plaintiff, §  
 4 §  
 VS. § DALLAS COUNTY, TEXAS  
 5 §  
 BHOOMANNA CHINTAM, §  
 6 §  
 Defendant. § 256TH JUDICIAL DISTRICT

8 REPORTER'S CERTIFICATION  
 DEPOSITION OF BHOOMANA CHINTAM  
 9 APRIL 9, 2021  
 VOLUME 1

10

11 I, Kathy E. Weldon, Certified Shorthand  
 12 Reporter in and for the State of Texas, hereby certify  
 13 to the following:

14 That the witness, BHOOMANA CHINTAM, was duly  
 15 sworn by the officer and that the transcript of oral  
 16 deposition is a true record of the testimony given by  
 17 the witness;

18 That the deposition transcript was submitted  
 19 on ^Month ^Now, 2021, to the witness or to the  
 20 attorney for the witness for examination, signature  
 21 and return to me by ^Month ^Now+20 days, 2021;

22 That the amount of time used by each party  
 23 at the deposition is as follows:

24 Mr. Jason B. Freeman - 4:30  
 Ms. Jennifer Wright Satagaj - 0:01

25



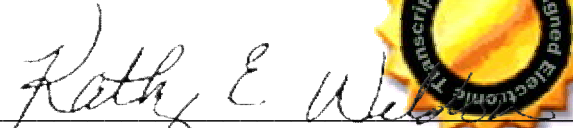
1                   That pursuant to information given to the  
2 deposition officer at the time said testimony was  
3 taken, the following includes counsel for all parties  
4 of record:

5 Mr. Jason B. Freeman, Attorney for Plaintiff  
6 Ms. Jennifer Wright Satagaj, Attorney for Defendant

7                   I further certify that I am neither counsel  
8 for, related to, nor employed by any of the parties or  
9 attorneys in the action in which this proceeding was  
10 taken, and further that I am not financially or  
11 otherwise interested in the outcome of the action.

12                   Further certification requirements pursuant  
13 to Rule 203 of TRCP will be certified to after they  
14 have occurred.

15                   Certified to by me this \_\_\_\_ day of  
16 \_\_\_\_\_, 2021.

17  
18   
19 Kathy E. Weldon, CSR No. 6166  
20 USHER REPORTING SERVICES  
21 Firm Registration #10278  
22 1326 Lockness Drive  
23 Allen, Texas 75013  
24 (214)755-1612  
25 karen@usherreportering.com  
My commission expires 12-31-21



1 FURTHER CERTIFICATION UNDER RULE 203 TRCP

2 The original deposition was/was not returned  
3 to the deposition officer on \_\_\_\_\_;

4 If returned, the attached Changes and  
5 Signature page contains any changes and the reasons  
6 therefor;


7 If returned, the original deposition was  
8 delivered to Mr. Jason B. Freeman, Custodial Attorney;

9 That \$\_\_\_\_\_ is the deposition  
10 officer's charges to the Plaintiff for preparing the  
11 original deposition transcript and any copies of  
12 exhibits;

13 That the deposition was delivered in  
14 accordance with Rule 203.3, and that a copy of this  
15 certificate was served on all parties shown herein on  
16 \_\_\_\_\_ and filed with the Clerk.

17 Certified to by me this \_\_\_\_\_ day of  
18 \_\_\_\_\_, 2021.

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Kathy E. Weldon, CSR No. 6166  
USHER REPORTING SERVICES  
Firm Registration #10278  
1326 Lockness Drive  
Allen, Texas 75013  
(214)755-1612  
karen@usherreportering.com  
My commission expires 12-31-21