

BEFORE THE LD. SOLE ARBITRATOR

MR. JUSTICE NARESH PATIL (RETD.)

In the matter of Arbitration between:

Supreme Manor Wada Bhiwandi Infrastructure Pvt. Ltd. ... Claimant

Vs.

State of Maharashtra & Ors.

... Defendant

AFFIDAVIT OF EVIDENCE IN LIEU OF EXAMINATION IN CHIEF OF

MR. PANKAJ UDESHI:

I, Pankaj Udeshi, aged about 47 years, adult, Indian Inhabitant, having my office at Supreme House, Plot No. 94/C, Pratap Gad, Opp. I.I.T Main gate, Powai, Mumbai - 400076 do hereby solemnly affirm and state as under :-

1. I say that I am the Head - Procurement and Finance of the Claimant Company above named. I say that I have been working with the Claimant Company since 2008 . I say that I am authorized to file the present Affidavit of Evidence in lieu of examination in chief and adduce evidence on behalf of the Claimant. I have been authorized by the board of Directors vide resolution dated 17th March 2023 to depose and file the present Affidavit in lieu of examination in chief for the Claimant abovenamed. The said document is a digitally signed document and does not bear any signature. I hereby tender the original board resolution marked as **Annexure "A"** to the additional compilation of documents. The contents thereof are true and correct. I pray that the same be taken on record and marked as Exhibit. I say that I am aware of the facts of the case and on the basis of records maintained by the Claimant I am able to depose to the same. I say that I



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have also gone through the various documents in relation to the present dispute which have been maintained by the Claimant in the ordinary course of business.

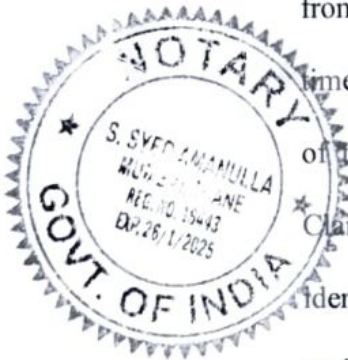
2. I say that pursuant to discussions that were held between the Claimant and the Lender Banks of the Claimant i.e. Allahabad Bank, Bank of India, Indian Overseas Bank, L&T Infrastructure Finance Company Ltd., Oriental Bank of Commerce, State Bank of India, State Bank of Patiala and Union Bank of India, the said Banks formed a consortium with Union Bank of India as the Lead Bank. I say that all banks issued Sanction letters after due negotiations. I say that the sanction letters came to be issued by the Banks and the same was received by the Claimant in the regular course of business. I say that although the Claimant had received the original sanction letters at the relevant time, and the original as well as the photocopies made from the original were kept in the records of the Claimant. Due to passage of time, the Claimant despite its best efforts was not able to trace the original of the said letters. However, the photocopies which were maintained by the Claimant in its records in the ordinary course of business, and which are identical to the original are being produced herewith. I say that the Claimant orally attempted to obtain certified copies of the sanction letters from the Banks but have been unable to obtain the same. I say that the contents of the said sanction letters are true and correct. I have produced the copy of Sanction letters at **Annexure "B Colly"** to the additional compilation of documents. I pray that the same be taken on record and marked as Exhibit.

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3. I say that pursuant to the issuance of sanction letter and subsequently, a common loan agreement was entered into on 30.08.2010 between the Claimant and Respondent which is marked as CX-4.

4. I say that the Claimant was in further need of loan to undertake the construction and development of a bypass from State High way no. 35 at Vishwabharati Phata – Bhinar – Vadpa Junction km 0.000 to 7.900 in Thane, Maharashtra on BOT basis. I say that pursuant to the discussions that were held between Union Bank of India and Claimant Company, the said bank issued a Sanction letter dated 17.05.2013 for issuance of loan amount of Rs. 83.66 crores. I say that the Sanction letter came to be issued by the Bank and the same was received by the Claimant in the regular course of business. I say that although the Claimant had received the original sanction letter at the relevant time, and the original as well as the photocopy made from the original were kept in the records of the Claimant. Due to passage of time, the Claimant despite its best efforts was not able to trace the original of the said letter. However, the photocopy which was maintained by the Claimant in its records in the ordinary course of business, and which is identical to the original are being produced herewith. I say that the Claimant orally attempted to obtain certified copy of the sanction letter from the Bank but have been unable to obtain the same. I say that the contents of the said sanction letters are true and correct. I hereby produce the copy of Sanction letter dated 17.05.2013 at **Annexure "C"** to the additional compilation of documents, which was received by the Claimant from Union Bank of India



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in the ordinary course of business. I pray that the Sanction letter be taken on record and marked as Exhibit.

5. Subsequently, the Claimant and Union Bank of India entered into a Second Common Loan agreement on 23.07.2013 which is marked as CX-9.

6. I say that after due negotiations were held between the Claimant and Lender Banks of the Claimant, sanction letters towards restructuring of the loan account came issued by the said Banks i.e. Allahabad Bank, Bank of India, Indian Overseas Bank, L&T Infrastructure Finance Company Ltd., Oriental Bank of Commerce, State Bank of India, State Bank of Patiala and Union Bank of India, the said Banks formed a consortium with Union Bank of India as the Lead Bank. I say that all banks issued Sanction letters after due negotiations. I say that the sanction letters came to be issued by the Banks and the same was received by the Claimant in the regular course of business.

I say that although the Claimant had received the original sanction letters at the relevant time, and the original as well as the photocopies made from the original were kept in the records of the Claimant. Due to passage of time, the Claimant despite its best efforts was not able to trace the original of the said letters. However, the photocopies which were maintained by the Claimant in its records in the ordinary course of business, and which are identical to the original are being produced herewith. I say that the Claimant orally attempted to obtain certified copies of the sanction letters from the Banks but have been unable to obtain the same. I say that the Sanction letter of Union Bank dated 23.03.2015 bears an acknowledgment evidencing the



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receipt of the sanction letter. I say that the contents of the said sanction letters are true and correct. I hereby produce the copies of Sanction letters that were issued by Banks at Annexure "D" to the Additional Compilation of documents I say that both the loan facilities were restructured and subsequently, the Claimant and the consortium of Banks entered into a master restructuring agreement dated 27.03.2015 which is annexed as Annexure B-1 to the documents produced by the second witness.

7. I hereby produce the Bank Statement of Union Bank of India, which is the banker of the Claimant, for the original facility from 02.11.2010 to 08.03.2023 along with the Certificate u/s 2A(a) as mandated by the Bankers Book Evidence Act, 1891 at Annexure E Colly to the additional compilation of documents. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

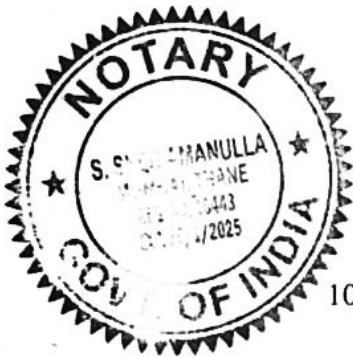
8. I hereby produce the Bank Statement of Union Bank of India which is the Banker of the Claimant for Bypass facility from 02.08.2013 to 13.03.2023 along with the Certificate u/s 2A(a) (which annexed at Annexure E Colly) as mandated by the Bankers Book Evidence Act, 1891 at Annexure F to the additional compilation of documents. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say

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that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

9. I hereby produce the Bank Statement of Union Bank of India, which is the Banker of the Claimant for Funded Interest Term loan from 31.03.2015 to 08.03.2023 along with the Certificate u/s 2A(a) (which annexed at Annexure E Colly) as mandated by the Bankers Book Evidence Act, 1891 at **Annexure G** to the additional compilation of documents. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



10. I hereby produce the Bank Statements of Union Bank of India, which is the Banker of the Claimant for Funded Interest Term loan from from 31.03.2015 to 08.03.2023 along with the Certificate u/s 2A(a) (which annexed at Annexure E Colly) as mandated by the Bankers Book Evidence Act, 1891 at **Annexure H** to the additional compilation of documents. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

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11. I hereby produce the Bank Statements of Union Bank, which is the Banker of the Claimant for Escrow Account from 01.09.2010 .04.03.2023 at **Annexure I** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

12. I hereby produce the Bank Statements of Current Account which is the Banker of the Claimant from 26.08.2010 to 04.03.2023 at **Annexure J** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



13. I hereby produce the Bank Statements of Union Bank of India's Deposit Account, which is the Banker of the Claimant from 05.04.2013 to 04.03.2023 along with at **Annexure K** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that

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the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

14. I hereby produce the Bank Statements of State Bank of India and State Bank of Patiala, which is the Banker of the Claimant of its Loan Account from 30.06.2010 to 04.03.2023 along with the Certificate u/s 2A(a) at **Annexure L** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



15. I hereby produce the Bank Statements of State Bank of Patiala, which is the Banker of the Claimant, of its Loan Account from 31.03.2015 to 04.03.2023 along with the Certificate u/s 2A(a) at **Annexure M** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

16. I hereby produce the Bank Statements of State Bank of Patiala, which is the Banker of the Claimant, of Funded Interest Term loan from 31.03.2015 to 04.03.2023 along with the Certificate u/s 2A(a) at **Annexure N** to the

additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

17. I hereby produce the Bank Statements of State Bank of Patiala, which is the Banker of the Claimant of Funded Interest Term loan from 31.03.2015 to 04.03.2023 along with the Certificate u/s 2A(a) at **Annexure O** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



18. I hereby produce the Bank Statements of State Bank of Patiala, which is the Banker of the Claimant of Current Account from 22.01.2010 to 19.07.2021 along with the Certificate u/s 2A(a) at **Annexure P** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

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19. I hereby produce the Bank Statements of State Bank of Patiala, which is the Banker of the Claimant of Current Account from 29.01.2010 to 22.02.2023 along with the Certificate u/s 2A(a) at **Annexure Q** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

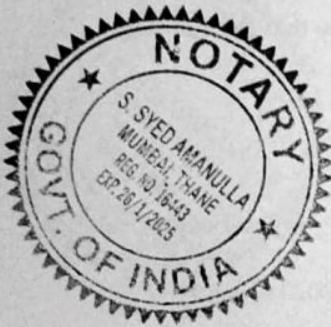
20. I hereby produce the Bank Statements of Punjab National Bank a.k.a Oriental Bank of Commerce, which is the Banker of the Claimant of loan Account from 02.11.2010 to 31.01.2023 along with the Certificate u/s 2A(a) at **Annexure R** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

21. I hereby produce the Bank Statements of Punjab National Bank a.k.a Oriental Bank of Commerce, which is the Banker of the Claimant of FILT from 31.03.2015 to 31.03.2023 along with the Certificate u/s 2A(a) at

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Annexure S to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

22. I hereby produce the Bank Statements of Indian Overseas Bank, which is the Banker of the Claimant of Loan Account from 01.11.2010 to 09.03.2023 along with the Certificate u/s 2A(a) at Annexure T to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



23. I hereby produce the Bank Statements of Indian Overseas Bank, which is the Banker of the Claimant of FITL from 31.03.2015 to 09.03.2023 along with the Certificate u/s 2A(a) at Annexure U to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that

the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

24. I hereby produce the Bank Statements of Indian Bank, which is the Banker of the Claimant of Loan Account from 01.11.2010 to 22.02.2023 along with the Certificate u/s 2A(a) at Annexure V to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. . I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



25. I hereby produce the Bank Statements of Indian Bank, which is the Banker of the Claimant of FITL Account from 28.03.2015 to 22.02.2023 along with the Certificate u/s 2A(a) at Annexure W to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

26. I hereby produce the Bank Statements of Bank of India, which is the Banker of the Claimant for its loan Account from 03.11.2010 to 07.10.2022 along with the Certificate u/s 2A(a) at Annexure X to the additional compilation

of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

27. I hereby produce the Bank Statements of Bank of India, which is the Banker of the Claimant for its FITL Account from 31.05.2015 to 12.08.2022 along with the Certificate u/s 2A(a) at **Annexure Y** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



28. I hereby produce the Bank Statements of L&T Finance, which is the Banker of the Claimant for its Loan Account (which was later taken over by J. M. Finance ARC) from 09.06.2017 to 28.02.2023 along with the Certificate u/s 2A(a) at **Annexure Z** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are

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true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

29. I hereby produce the Bank Statements of L&T Finance, which is the Banker of the Claimant for its FITL Account (which was later taken over by J. M. Finance ARC) from 09.06.2017 to 28.02.2023 along with the Certificate u/s 2A(a) at Annexure AA to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.

30. I hereby produce the Bank Statements of L&T Finance, which is the Banker of the Claimant for its Non Convertible Debenture Facility (which was later taken over by J. M. Finance ARC) from 09.06.2017 to 28.02.2023 along with the Certificate u/s 2A(a) at Annexure BB to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



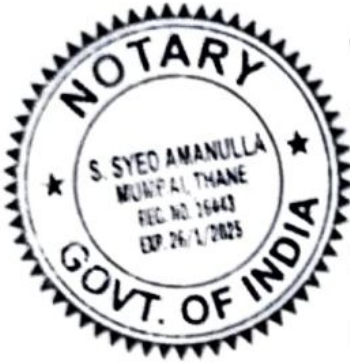
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31. I hereby produce the Bank Statements, which is the Banker of the Claimant of Axis Bank from 01.01.2015 to 31.12.2022 along with the Certificate u/s 2A(a) at **Annexure CC** to the additional compilation of documents as mandated by the Bankers Book Evidence Act, 1891. I say that the said bank statement and the certificate were obtained by the Claimant from the Bank in the ordinary course of business. I say that the contents thereof are true and correct. I say that I have been able to verify that the contents of the said statement are true and correct. I pray that the same be taken on record and marked as Exhibit.



32. I hereby produce the Audited Balance Sheet and its annexures from financial year 2009-2010 i.e. for the year ending 31st March 2010 till f.y. 2021-2022 i.e. for the year ending 31st March 2022. All the said Balance Sheets have been duly audited and thereafter certified by the Auditor as well as Director of Claimant Company and the same was duly filed with the Income Tax Authorities. I say that the contents thereof are true and correct. I say that the Balance Sheets were prepared by the Claimant Company in ordinary course of business. I say that the said audited balance Sheets have been maintained by the Claimant Company in its records in the ordinary course of business I say that the contents thereof are true and correct. I hereby produce the original Audited Balance Sheet at **Annexure DD Colly** to the additional compilation of documents. I pray that the same be taken on record and marked as Exhibit.

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33. I say that a letter dated 20.12.2010 came to be addressed by the Claimant to the Secretary of PWD Division of the State of Maharashtra. I say that the contents of the said letter are self-explanatory. I say that I am producing herewith an office copy of the letter dated 20.12.2010. I say that the original of the said letter was sent to Secretary of PWD Division of the State of Maharashtra and the Claimant has retained an office copy of the same for its records. I am producing the said office copy. The said letter is signed by Ajit M. Deshpande, Chief Executive Officer of the Claimant Company. I identify the signature of Mr. Ajit M. Deshpande as I have seen him signing other documents in my presence in the ordinary course of business. I say that the letter dated 20.12.2010 was received by the State of Maharashtra on 30.12.2010 and it bears the receipt stamp on the first page of the letter. I say that the said letter was addressed in the ordinary course of business. I say that the contents thereof are true and correct. I pray that the letter at Pg. 521 at Exhibit 4 be taken on record and marked as Exhibit.

34. I say that Ram Infrastructure Limited, Tapi Prestressed Product Limited and Supreme Infrastructure BOT Private Limited, entered into a Memorandum of Understanding for constitution of the Claimant Company. I am producing herewith a copy of Memorandum of Understanding dated 18.12.2009 as the original is in possession of Ram Infrastructure Limited. I have seen the original and the copy of the Memorandum of Understanding and the copy reproduced herewith and the original agreement are the same. I say that I attempted to obtain the original of the agreement from Ram Infrastructure Ltd., but they refused to part with possession of the original. However, they

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allowed the Claimant to make a photocopy from the original agreement. The said photocopy has been produced herewith which is an exact replica of the original agreement. I say that the said document has been signed by Mr. Vikram Sharma, Director on behalf of Supreme Infrastructure BOT Private Limited. I have seen Mr. Vikram Sharma signing in regular course of business in my presence and I identify his signature. The copy of the said document have been maintained in the office of the Claimant Company in the ordinary course of business and the contents thereof are true and correct. I say that I am producing the memorandum of understanding from the office records of the Claimant Company. I pray that the said MOU dated 18.12.2009 is marked at Exhibit 5 at page 526 to the Statement of Claim. I pray that the same be taken on record and be marked as Exhibit.



35. I say that a tripartite agreement named as Special Purpose Vehicle (SPV) Agreement was entered between the Government of Maharashtra through its executive engineer, Public Works Division, Thane, Ram infrastructure ltd., M/s Tapi Prestressed Product Limited and the Claimant company on 30.01.2010. I am producing a copy of the Special Purpose Vehicle (SPV) Agreement dated 30.01.2010 as the original is in possession of the Respondent. I have seen the original and the copy of the Special Purpose Vehicle (SPV) Agreement and the copy reproduced herewith and the original agreement are the same. The said photocopy has been produced herewith which is an exact replica of the original agreement. I say that the said document has been signed by Mr. Vikram Sharma, Director on behalf of Supreme Infrastructure BOT Private Limited. I have seen Mr. Vikram

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Sharma signing in regular course of business in my presence and I identify his signature. The said document has been maintained in the office of the Claimant Company in the ordinary course of business and the contents thereof are true and correct. I say that I am producing the said Special Purpose Vehicle (SPV) Agreement from the office records of the Claimant Company. I pray that the said SPV Agreement dated 30.01.2010 is marked at Exhibit 6 at page 542 to the Statement of Claim. I pray that the same be taken on record and be marked as Exhibit.

36. Subsequently, due negotiations were held between the parties and a common loan agreement was entered into between the parties on 30.08.2010. I say that a Common Loan Agreement dated 30.08.2010 was entered into between the Allahabad Bank through its Senior Manager, Bank of India through its Constituted Attorney, Indian Overseas Bank through its General Manager, L&T Infrastructure Finance Company Ltd. through its Authorized Signatory, Oriental Bank of Commerce through its General Manager, State Bank of India through its Chief Manager, State Bank of Patiala through its Chief Manager, Union Bank of India through its General Manager. I am producing the copy of the Common Loan Agreement dated 30.08.2010 as the original is in possession of Security Trustee i.e. Union Bank of India. I say that the Common Loan Agreement has been signed by Mr. Vikas Sharma, Director of the Claimant Company. I have seen Mr. Vikas Sharma signing in regular course of business and I identify his signature. The said document has been maintained in the office of the Claimant Company in the ordinary course of business and the contents thereof are true and correct. I

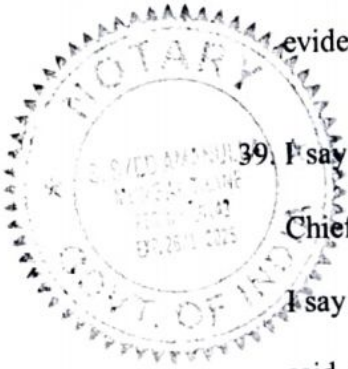
am producing the Common Loan Agreement from the office records of the Claimant Company. I pray that document at Exhibit 8 at Page No. 549 of Statement of Claim be taken on record and marked as Exhibit.

37. I say that a letter dated 15.12.2011 was addressed by Ajit M. Deshpande the Chief Executive Officer of Claimant Company to the Executive Engineer, Public Works Division, Thane of Respondent. I say that the contents of the said letter are self-explanatory. I say that I am producing herewith an office copy of the letter dated 15.12.2011. I say that the original of the said letter was sent to Secretary of PWD Division of the State of Maharashtra and the Claimant has retained an office copy of the same for its records. I am producing the said office copy. The said letter is signed by Ajit M. Deshpande, Chief Executive Officer of the Claimant Company. I identify the signature of Mr. Ajit M. Deshpande as I have seen him signing other documents in my presence in the ordinary course of business. I pray that the letter at Exhibit 10 at Page 717 be taken on record and marked as Exhibit.

38. I say that the Executive Engineer addressed a letter to the Superintending Engineer on 19.11.2012 and a copy of the same was also marked to the Claimant. The copy of the same was received by the Claimant in due course of business. I hereby reproduce the original copy of the letter that was marked to the Claimant. I say that the said letter was obtained by the Claimant in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I say that the contents thereof are true



and correct. I pray that the letter at Exhibit 13 at Page 60 to 71 of secondary evidence be taken on record and marked as Exhibit.



39. I say that a letter was addressed by the Superintending Engineer, thane to Chief Engineer, Mumbai as to four laning and maintenance of the said road.

I say that I am producing a copy of the letter dated 22.11.2012. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit 14 at Page 731 be taken on record and marked as Exhibit.

40. I say that a letter was addressed by the Chief Engineer, Mumbai to the Deputy Secretary as to quadrupling and maintenance of the said road. I say that I am producing a copy of the letter dated 08.01.2013. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit 15 at Page 733 be taken on record and marked as Exhibit.

41. I say that a second common loan agreement was entered into between the Claimant Company, Union Bank of India (New Lender) through its Chief Manager, Union Bank of India (Lenders Agent) through its Chief Manager

and Union Bank of India, Security Trustee on 23.07.2013. I am producing herewith original Common Loan Agreement dated 23.07.2013. I have seen Mr. Vikram Sharma signing in regular course of business in my presence and I identify his signature. The said document has been maintained in the office of the Claimant Company in the ordinary course of business and the contents thereof are true and correct. I say that I am producing the second common loan agreement from the office records of the Claimant Company. I pray that the Common Loan Agreement II executed on 23.07.2013 at Exhibit 19 at Page 741 be taken on record and marked as Exhibit.



42. I say that a Letter dated 20.11.2018 was addressed by the Claimant Company signed by Mr. Z. N. Shaikh the General Manager Execution / Toll Head of the Claimant Company to the Executive Engineer, Public Works Division, Jawahar, Palghar of Respondent. The said letter is signed by Z. N. Shaikh, General Manager Execution / Toll Head of the Claimant Company. I am producing herewith office copy of letter dated 20.11.2018 which is signed by Mr. Z. N. Shaikh as the original copy is in possession of the Respondent. I identify the signature of Mr. Z. N. Shaikh as I have seen him signing other documents in regular course of business. I say that the contents thereof are true and correct. I pray that the letter at Exhibit 20 at Page 868 of the Statement of Claim be taken on record and marked as Exhibit.

43. I say that Letter dated 07.05.2015 came to be addressed by the Tehsildar of Bhiwandi to Supreme Infrastructure India Pvt. Ltd. I say that the copy of said letter was obtained by the Claimant in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the

ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the Letter dated 07.05.2015 at Page Nos. 872 of the Statement of Claim be taken on record and marked as Exhibit.



44. I say that Letter dated 07.05.2015 came to be addressed by the Tehsildar of Bhiwandi to Supreme Infrastructure India Pvt. Ltd. I say that the said letter was obtained by the Claimant in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the Letter dated 07.05.2015 at Page Nos. 873 of the Statement of Claim be taken on record and marked as Exhibit.

45. I say that on 31.10.2015 the Learned Civil Judge Senior Division passed an order dated 31.10.2015 in an interim application filed for injunction in a regular civil suit bearing no. 368 of 2015 restraining Respondent Nos. 3 & 4 from obstructing the construction of the Road. The Claimant has maintained the copy of the order passed by the Civil Court in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the order at Page 874 be taken on record and marked as Exhibit.

46. I say that an injunction application came to be filed before the Learned Civil Judge against Pritesh Dawne dated 08.05.2015 restraining Respondent Nos. 3 & 4 from obstructing the construction of the Road. The Claimant has

maintained the copy of the Injunction application from its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the said application at Page 879 be taken on record and marked as Exhibit.

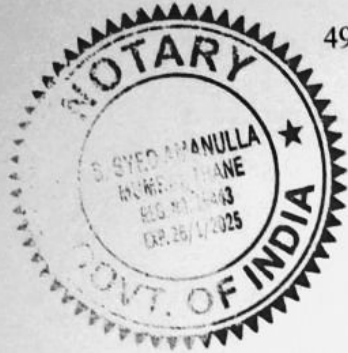
47. I say that a letter dated 17.12.2015 came to be addressed by the Claimant Company to Shri V. G. Mhatre, Government registered contract & suppliers for dealing and approving land acquisition works. The said letter is signed by Mr. Kamlesh Chechani, Financial Advisor and Mr. Z. N. Shaikh. I identify the signature of Mr. Mr. Kamlesh Chechani and Mr. Z. N. Shaikh as I have seen them signing other documents in regular course of business. I hereby produce the office copy of letter dated 17.12.2015 as the original is possession of Shri. V. G. Mhatre. I say that the said letter is accepted by Shri. V. G. Mhatre on 05.01.2016. I say that the contents thereof are true and correct. I pray that the letter dated 17.12.2015 at Page 893 of the Statement of Claim be taken on record and marked as Exhibit.

48. I say that a letter was addressed by the Chief Engineer, Mumbai to the Secretary (Roads) on 03.08.2012 pertaining to the four laning of the said road. I say that I am producing a copy of the letter dated 03.08.2012. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of



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the Claimant Company. I pray that the letter at Exhibit 20 Colly at Page 908 be taken on record and marked as Exhibit.



49. I say that a letter dated 21.04.2011 was addressed by the office of Executive Engineer of Thane PWD to the Deputy Conservator of Thane pertaining to widening of four laning of the said road. I say that I am producing a copy of the letter dated 21.04.2011. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit 20 Colly at Page 910 be taken on record and marked as Exhibit.

50. I say that a statement showing compensation to be paid by the Respondents is reproduced at Exhibit 25 at Page 923 of the Statement of Claim. I say that the said statement is prepared by our office in the ordinary course of business based on circulars dated 31.08.2017, 16.06.2018, 19.11.2015 and an internal proposal certifying the said amounts that was issued by the Government in connection with exemption being granted to light motor vehicles, State Transport Buses and School Buses from payment of toll charge. The Circular set out a manner of the State Government to reimburse the loss suffered on account of the exemption. The copy of the circulars issued by the Respondent is marked as **Annexure "EE"** Colly to the additional compilation of documents. The said circulars have been issued by the Respondent. I pray that the same be taken on record and marked as Exhibit.

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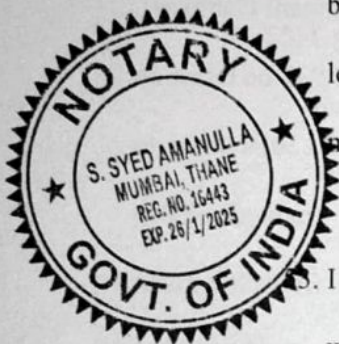
51. I say that based on the circulars issued by the Respondent, the department recorded the same in the measurement book and disbursed part payments to the Claimant. I say that the said measurement sheet and abstract was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the extract at Exhibit 20 Colly from Page 924 to 932 be taken on record and marked as Exhibit. I say that a letter dated 20.04.2019 came to addressed by the Claimant Company to the Executive Engineer, PWD JAWAR division pertaining to the Four Lane of Wada Bhiwandi State Highway signed by Hemant Patil. I say that the said letter was addressed by the Claimant in the ordinary course of business and the same was received by the Executive Engineer. The said letter is signed by Hemant Patil. I identify the signature of Mr. Hemant Patil as I have seen him signing other documents in regular course of business. I hereby produce the office copy of letter dated 20.04.2019 as the original is in possession of Executive Engineer of PWD Division. I pray that the letter at Exhibit 26 Colly at Page 958 be taken on record and marked as Exhibit.



52. I say that a letter dated came to be addressed to M.s Kshatriya Infrastructure Pvt. Ltd. on 01.11.2019 pertaining to the Four Laning of Wada Bhiwandi Road and construction of By pass road. I say that the contents of the said letter are self-explanatory. I say that I am producing herewith an office copy of the letter dated 01.11.2019. I say that the original of the said letter was

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sent to M.s Kshatriya Infrastructure Pvt. Ltd. and the Claimant has retained an office copy of the same for its records. I am producing the said office copy. The said letter is signed by Mr. Chandrashekhar Naval of the Claimant Company. I identify the signature of Mr. Chandrashekhar Naval as I have seen him signing other documents in my presence in the ordinary course of business. I say that the said letter was addressed in the ordinary course of business. I say that the contents thereof are true and correct. I pray that the letter at Exhibit 26 Colly at Page 1011 to 1032 be taken on record and marked as Exhibit.



53. I say that a Cash Flow Projection Statement as submitted by the Claimant was forming part of the Bidding which was given to the Respondent. The copy of Cash Flow Projection Statement is annexed at Exhibit C4 at Pg. 1054. I say that the said cash flow projection statement formed a part of the bid document as originally submitted by the Claimant to the Respondent. I say that the copy original of the cash flow statement is also available with the Respondent. I say that the contents of the said cash flow statement are true and correct. I say that the said cash flow statement was prepared in the ordinary course of business. I pray that the same be taken on record and marked as Exhibit.

54. I Say that the claim against revenue loss statement chart was prepared by the Claimant which depicts the loss suffered by the Claimant in the ordinary course of business in the said project. I say that the copy of the said statement is prepared by the Claimant Company. I say that the said

statement has been prepared in lieu of the loss that is depicted by the Claimant. I say that by letter dated 20.11.2018 the Claimants have claimed the Revenue loss suffered by the Claimant and the copy of letter was delivered to the Respondent. I say that the said document is reproduced at Exhibit C5 Colly at Page 1056 and the same be taken on record and marked as Exhibit.

55. I say that a letter was addressed by the Deputy Conservator of forests, Jawahar Forest Division to Executive Engineer of Thane on 19.10.2012. I say that I am producing a copy of the letter dated 19.10.2012. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C5 at Page 1060 be taken on record and marked as Exhibit.

56. I say that a letter was addressed by the Executive Engineer of Thane on to Superintendent Engineer. I say that I am producing a copy of the letter I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C5 at Page 1061 be taken on record and marked as Exhibit.



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57. I say that a letter was addressed by Superintendent Engineer to Executive Engineer. I say that I am producing a copy of the letter dated 16.01.2013. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C5 at Page 1061 be taken on record and marked as Exhibit.



58. I say that a letter dated 20.11.2018 came to be addressed by the Claimant to the Respondent. I say that the contents of the said letter are self-explanatory. I say that I am producing herewith an office copy of the letter dated 20.11.2018 along with its annexures. I say that the original of the said letter was sent to Respondent and the Claimant has retained an office copy of the same for its records. I am producing the said office copy. The said letter is signed by Mr. Z. N . Shaikh, General Manager of the Claimant Company. I identify the signature of Mr Mr. Z. N . Shaikh as I have seen him signing other documents in my presence in the ordinary course of business. I say that the letter dated 20.11.2018 was received by the State of Maharashtra. I say that the said letter was addressed in the ordinary course of business. I say that the contents thereof are true and correct. I pray that the letter at Pg. 1094 at Exhibit C5 be taken on record and marked as Exhibit.

59. I say that a letter dated 31.07.2013 was addressed by Sub Divisional officer of Vasai to Respondent. I say that I am producing a copy of the letter dated 31.07.2013. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C6 at Page 1113 be taken on record and marked as Exhibit.

60. I say that a letter dated 24.10.2010 was addressed by torrent Power Limited to Respondent. I say that I am producing a copy of the letter dated 24.10.2010. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C6 at Page 1153 be taken on record and marked as Exhibit.



61. I say that a letter dated 29.07.2011 was addressed by MAHA Vitaran to Superintending Engineer. I say that I am producing a copy of the letter dated 29.07.2011. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained

from the records of the Claimant Company. I pray that the letter at Exhibit C6 at Page 1157 be taken on record and marked as Exhibit.

62. I say that a letter dated 25.06.2012 was addressed by Superintending Engineer to Respondent . I say that I am producing a copy of the letter dated 25.06.2012. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C7 at Page 1170 be taken on record and marked as Exhibit.

63. I say that a letter dated 07.05.2012 was addressed by Respondent to Superintending Engineer. I say that I am producing a copy of the letter dated 07.05.2012. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C7 at Page 1172 be taken on record and marked as Exhibit.

64. I say that the Respondent had prepared and issued an estimate for shifting of utility services and accordingly, the Claimant carried out the said work. I say that the said document is prepared by the Respondents and the copy of the



same was received by the Claimant in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C7 at Page 1176 be taken on record and marked as Exhibit.

65. I say that the Claimants raised bills for a period from 1st July 2013 to 15th December 2013 approved by the Project director pertaining to the four laning of manorwada road including bypass road for an amount of Rs. 18,06,48,612 along with the abstract sheet. The said bills are certified and have been prepared in the ordinary course of business. I say that copies of the bills are in possession of the Bank. I pray that the said interim certificate at Exhibit C8 at Page 1396 be taken on record and marked as Exhibit.



66. I say that the project status report of the said road was prepared by K. S. 'Ayyadurai, who was duly appointed by the Lenders as per the Common Loan Agreements and condition precedent before releasing the payment. I hereby produce the original Project Report. The same was retained by the Claimant in the ordinary course of business. The said report is certified by K. S. 'Ayyadurai and have been prepared under the Claimant's instructions. The contents thereof are true and correct. I pray that the said projects status at Exhibit C8 at Page 1049 be taken on record and marked as Exhibit.

67. I say that the project status was prepared by "BHIDE ASSOCIATES" who was duly appointed by the Lenders as per the Common Loan Agreements

and condition precedent before releasing the payment to prepare the project status report of the said road I hereby produce the original Project Report. The same was retained by the Claimant in the ordinary course of business. The said report is certified by BHIDE ASSOCIATES and have been prepared under the Claimant's instructions. The contents thereof are true and correct. I pray that the said projects status at Exhibit C8 at Page 1437 be taken on record and marked as Exhibit.



I say that a letter dated 30.07.2013 came to be addressed by the Claimant to the Deputy General Manager of Union Bank of India. I say that the contents of the said letter are self-explanatory. I say that I am producing herewith an office copy of the letter dated 30.07.2013. I say that the original of the said letter was sent to Deputy General Manager of Union Bank of India and the Claimant has retained an office copy of the same for its records. I am producing the said office copy. The said letter is signed by Mr. Vikram Sharma of the Claimant Company. I identify the signature of Mr. Vikram Sharma as I have seen him signing other documents in my presence in the ordinary course of business. I say that the letter dated 30.07.2013 was received by the Union Bank of India. I say that the said letter was addressed in the ordinary course of business. I say that the contents thereof are true and correct. I pray that the letter at Pg. 1469 at Exhibit C8 be taken on record and marked as Exhibit.

69. I say that Union Bank of India was in receipt of a Draw Down Certificate that was addressed by Bhide Associates pursuant to the Common Loan agreement dated 20th July 2013. I say that the letter was addressed by Bhide

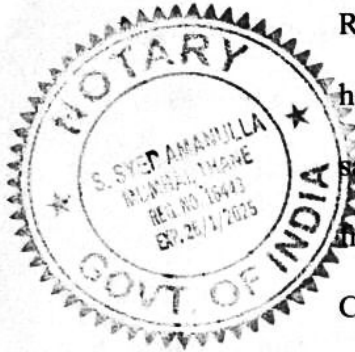
Associates to Union Bank of India on 20.07.2013. I say that I am producing the certificate. I say that the said letter was obtained by the Claimant in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the certificate at Exhibit C8 at Page 1472 be taken on record and marked as Exhibit.

70. I say that the Claimant prepared a report named as "Claim Against Vishvabharti Patha to Vadpe – Land Acquisition claim" which states that the claim to be received from the Respondent towards the said land acquisition. The said report is prepared by the Claimant Company and a copy of the same was addressed to the respondent vide letter dated 20.12.2013 which is annexed at Exhibit 4 of the Statement of Claim. The said report is prepared by the Claimant itself. The Claimant states that the contents thereof are true and correct. I reproduce the copy of the said chart was prepared for reference purposes at Exhibit C7 at Page Nos.1483-1498.

71. I say that a letter dated 19.10.2013 was addressed by Deputy Conservations of Forests to Respondent. I say that I am producing a copy of the letter dated 19.10.2013. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C12 at Page 1611 be taken on record and marked as Exhibit.



72. I say that a letter dated 10.04.2013 was addressed by Respondent to Deputy Conservations of Forests. I say that I am producing a copy of the letter dated 10.04.2013. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C12 at Page 1613 be taken on record and marked as Exhibit.



73. I say that a letter dated 11.05.2016 was addressed by Superintending Engineer to Deputy Conservations of Forests. I say that I am producing a copy of the letter dated 11.05.2016. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C12 at Page 1616 be taken on record and marked as Exhibit.

74. I say that the said chart at Pg. 1663 is prepared by the Claimant towards idling of machinery for a period of 5 months which is to be received from the Respondent. The said report is prepared by the Claimant Company based on a letter addressed by the Respondent on 19.11.2012 which is at Exhibit CX-6. The said report is prepared by the Claimant itself. The contents thereof are

true and correct. I reproduce the copy of the said chart was prepared for reference purposes at Exhibit C13 at Page Nos. 1663.

75. I say that the said chart at Page 1674 is prepared by the Claimant which is to be received form the Respondent. The said report is prepared by the Claimant Company. The said report is prepared by the Claimant itself. I say that the contents thereof are true and correct. I reproduce the copy of the said chart was prepared for reference purposes at Exhibit C14 at Page Nos. 1674. I pray that the same to be taken on record and marked as Exhibit.

76. I say that a letter dated 19.10.2012 was addressed by Deputy Conservations of Forests to Respondents. I say that I am producing a copy of the letter dated 19.10.2012. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C14 at Page 1677 be taken on record and marked as Exhibit.

77. I say that a letter dated 18.11.2015 was addressed by Deputy Conservations of Forests to Respondents. I say that I am producing a copy of the letter dated 18.11.2015. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have



obtained from the records of the Claimant Company. I pray that the letter at Exhibit C14 at Page 1678 be taken on record and marked as Exhibit.

78. I say that a letter dated 11.05.2016 was addressed by superintending Engineer to Deputy Conservation of forests Jawahar. I say that I am producing a copy of the letter dated 11.05.2016. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C17 at Page 1681 be taken on record and marked as Exhibit.



79. I say that a letter dated 10.04.2013 was addressed by Respondent to superintending Engineer. I say that I am producing a copy of the letter dated 10.04.2013. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C17 at Page 1684 be taken on record and marked as Exhibit.

80. I say that a letter dated 16.01.2013 was addressed by Superintendent Engineer to executive engineer. I say that I am producing a copy of the letter dated 16.01.2013. I say that the said letter was obtained by the Claimant from the Respondent in the ordinary course of business and thereafter the

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Claimant has maintained the same in its records in the ordinary course of business. I say that the copy being produced by me is the copy that I have obtained from the records of the Claimant Company. I pray that the letter at Exhibit C17 at Page 1686 be taken on record and marked as Exhibit.

Solemnly affirmed at Mumbai }
Dated this day of May 2023 }

Pankaj H. Udeshi

Identified by me,

Before me,

Sujit Lahoti & Associates

Sujit Lahoti

Advocates for the Claimant



BEFORE ME

S. Syed Amanulla
16/5/23

S. SYED AMANULLA
B.SC.(Hons) LL.B
ADVOCATE & NOTARY GOVT. OF INDIA
REG. NO. 16443

'Q' Block, Room No. 86, Jhulamaidan Road,
Bandra Plot, Jogeshwari (E), Mumbai-400 092
Mobile : 9452664771

Sr. No.	774-
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