

Title: Preliminary Witness List for Discovery

Case: Tara Batra vs. Punam A. Kumar & Others

Court: High Court of Delhi

#### Document Purpose:

This document lists potential witnesses whose testimonies may be relevant to the financial and legal disputes in the case concerning the management of Mrs. Veena Paintal's financial assets.

#### Witness List:

##### Family Members and Relatives:

Tara Batra - Plaintiff and niece of Mrs. Paintal. Can testify regarding Mrs. Paintal's expressed wishes and intentions for her financial assets.

Rajat Paintal - Son of Mrs. Paintal. Can provide insights into his mother's financial dealings and her relationship with the respondents.

##### Bank Officials:

John Doe, Manager at XYZ Bank - Handled Mrs. Paintal's accounts and witnessed changes made post-2007. Can testify regarding the procedures followed and the authenticity of the documents presented for changes.

Jane Smith, Compliance Officer at XYZ Bank - Can provide testimony on the bank's policies regarding account changes and nominee additions.

##### Financial Experts:

Dr. Emily White, Forensic Accountant - Specializes in analyzing financial transactions for legality and authenticity. Will provide an expert opinion on the financial documents and transactions in question.

Mark Brown, Financial Advisor - Was Mrs. Paintal's financial advisor from 2000 to 2015. Can discuss her financial plans and any known intentions regarding her estate.

##### Legal Experts:

Sarah Lee, Estate Lawyer - Can discuss standard legal practices in estate management and the implications of unauthorized changes in beneficiary details.

#### Instructions for Use:

Each party may contact and interview these witnesses to determine the relevance of their testimony.

Witnesses may be subpoenaed to appear in court or provide deposition under oath.