

Title: Discovery Request - Financial Statements Analysis

Purpose: To obtain all financial records pertinent to the case of Tara Batra vs. Punam A. Kumar & Others.

Content:

Request for all bank statements from 2005 to 2021.

Request for all documents related to the modification of beneficiary details after 2007.

Interrogatories regarding the authorization of changes made to financial accounts post-2007.

2. Financial Statement Sample

Title: Consolidated Financial Statement of Mrs. Veena Paintal

Content:

Summary of all accounts held by Mrs. Paintal at XYZ Bank.

Details of transactions and changes made from January 2007 until the date of her demise.

Annotations highlighting discrepancies and unauthorized changes.

3. Interrogatory Sample

Title: Interrogatories to Respondent No.1 (Punam A. Kumar)

Content:

Detail the circumstances and legal basis under which you were added as a co-holder to Mrs. Paintal's bank accounts.

Provide evidence of any communication with Mrs. Paintal regarding changes to her financial accounts.

4. Request for Admission

Title: Request for Admission by Tara Batra

Content:

Respondent to admit that no written authorization from Mrs. Paintal was provided for the posthumous changes to her bank accounts.

Respondent to admit the receipt of financial benefits from changes made after Mrs. Paintal's death.

5. Witness List

Title: Preliminary Witness List for Discovery

Content:

List of family members who can testify about Mrs. Paintal's intentions regarding her financial accounts.

Bank employees who handled Mrs. Paintal's accounts.

Financial experts who can analyze the legality and validity of the account changes.