

**IN THE COURT OF HON'BLE DISTRICT & SESSION JUDGE PUNE**

**AT PUNE**

**Cri. Bail App. No. 4788/2023**

Applicant Singh

... Applicant

v/s

State Of Maharashtra

Mundhwa Police Station

... Respondent

**Written Arguments and Additional  
Grounds on behalf of Applicant**

**MAY IT PLEASE YOURHONOUR:**

On behalf of Applicant most humbly and respectfully submitted as under;

1. It is submitted that, contrary to Complainant's assertion that her father expended a sum of Rs. 35,00,000/- for their wedding, Applicant avers that the matrimonial expenses were shared equally between both families for the wedding events that took place in Mumbai were approximately 16,00,000/- expenses were incurred and the Applicant transferred an amount of Rs 8,57,000/- at time of marriage from his account to account of Complainant's father Mr.

Gurusharan Singh Khalsa. It is further submitted that Marriage Reception which took on 24/06/2017, at Delhi, where Complainant & her parents, friends & relatives had attended the reception function, the full expenses, amounting to Rs. 15,00,000/-, were incurred solely by Applicant's father.

2. It is submitted that, furthermore, Complainant's contention that her father contributed Rs. 5,00,000/- towards the purchase of their house is factually incorrect. Post-marriage, Applicant and Complainant had been consistently remitting almost their entire salaries to Complainant's father, who assured them that he was responsibly investing/managing their combined earnings. After the purchase of the house, Complainant's father merely returned the money which was cumulatively contributed by Applicant and Complainant from July 2017 to December 2017. Therefore, it cannot be construed as a contribution from Complainant's father towards the purchase of the house. It is further submitted that applicant is regularly paying EMI of Rs. 38,446/- said House right from day one details are into his bank statements which attached with list of documents.

3. It is submitted that, contrary to the claims made by Complainant, she would avoid going to Applicant's parental house at any visit to Delhi by any chance. This can be seen from the chats between Applicant and Complainant on file number messages73.html as submitted for the conversation

on 4 November 2017. She was on a trip to Delhi for which Applicant's father was helping her brother get professionally established. She chose to stay with her relatives, who she was not in talking terms since many years, instead of choosing to stay with Applicant's parents. This is in contrast to how Applicant stayed with her parents for the first 6 months of their marriage (July to December 2017) in Mumbai and then Complainant's parents came to stay with Applicant and Complainant for the first half of 2018 (January to July 2018).

4. It is submitted that, the accusation that Applicant persistently engaged in disputes with Complainant over the issues concerning the house and financial matters is devoid of any basis. No such altercations, as alleged by Complainant, ever transpired between them.
5. It is submitted that, Applicant strongly refutes these allegations leveled against him by Complainant, stating they are devoid of any factual basis and have been made with the intention of causing unwarranted harm to his reputation. Therefore, Applicant seeks a thorough examination of these assertions and believes that upon careful scrutiny, the court will find them unsubstantiated and false.
6. It is submitted that, in contradiction to Complainant's accusation, Applicant acknowledges that while Complainant was indeed working from home, she

deliberately overlooks his significant contributions towards the setup of **"M/s Brand Mender"** and operation of the Digital marketing business. A comprehensive review of email correspondences will affirm that Applicant was instrumental in registering the business, securing clients, and recruiting the first three employees. Moreover, he managed the accounts throughout the disputed period of alleged disturbance. The reality is that Complainant often quarrelled with Applicant, since employees use to attend company from our residential premisses. Overwhelmed by the constant tension, Applicant suggested relocating the business to an external premises for Complainant's wellbeing. Despite her initial search for suitable locations, Complainant resisted the idea due to the perceived high rental costs and refused to cease the disagreements. Notably, Applicant has not received any share of the business profits to this day, despite his initial investment towards registration of Brand Mender at the residential address they both occupied.

7. It is submitted that, Applicant categorically denies Complainant's claim of receiving her entire salary, and submits his bank account statements as evidence to refute this assertion. Rather Applicant after May 2018 had transfer Rs. 2,17,000/- into the account of Complainant to support her education and into her Business.

8. It is submitted that, similarly, Complainant's claim of bearing all household expenses is contradicted by Applicant. His financial contributions, evidenced by submitted bank and credit card statements, included a monthly EMI of Rs. 38,446/-, a Society maintenance fee of Rs. 6,000/-, property tax of Rs 12,555/- per year, and an average electricity bill of Rs. 3,000/-. In addition, he incurred expenses related to leisure activities, foreign and domestic trips - including a Europe trip post-marriage costing Rs. 3 lakh and all expenses for their Goa trip. He also covered costs for several trips to Delhi and Mumbai. Furthermore, Applicant also contributed towards other household expenditures such as groceries and ordered food, as demonstrated in his credit card statements. Applicant, as evidenced by his bank statements and credit card bills, has actually been financially supportive.
9. It is submitted that, contrary to Complainant's insinuations, Applicant was never informed of any inappropriate conduct by Raunaq. In fact, Complainant regularly praised Raunaq and worked collaboratively with him as a **digital partner at Brand Mender** for over two years.
10. It is submitted that, the evidence presented attests to a situation where Complainant's earnings, prior to her marital union, were systematically appropriated by her parents, leaving her with a monthly stipend of INR 5000/-. Subsequent

to her marriage, there were reported instances of persistent financial requests from Complainant's father, ostensibly for familial needs. On at least one occasion, Applicant responded to these requests by providing financial aid to Complainant's father, doing so at Complainant's urging. One such payment was made by Applicant to Complainant's father for Rs 10,000/- on 16 April 2020, NEFT UTR No: SBIN120107736802

11. It is submitted that, Complainant experienced a significant degree of constraint within her family prior to her marriage, including prohibitions on wearing western-style clothing and restrictions on the access to the vast majority of her own income. These restraints appear to have precipitated an eventual and marked reaction from Complainant, who subsequently acquired multiple tattoos, which she has identified to Applicant as symbols of personal independence.

12. It is submitted that, collectively, these events and the consequent behavioural changes observed in Complainant could be interpreted as indicative of atypical behavior patterns, potentially reflecting an underlying psychological reaction to the circumstances described above.

13. It is submitted that, In the flights from India to Europe and return July 2017, Complainant forced Applicant to have

sexual pleasure in the aircraft under a cloth in full public presence. She also revealed her fantasies to Applicant to have objects impregnated into her for sexual pleasure. In one of her admissions she informed Applicant that she could pleasure herself even during the presence of her parents, and shared the details of pornographic material that she used to like to him. She even revealed that she liked being dominated and used to watch Japanese porn videos for her sexual pleasure.

14. It is submitted that, Complainant also informed Applicant that one of the restrictions put on her by her parents was that she could not study beyond a radius of 2 km from her house. Hence, she was made to study at Padmabhushana Vasantdada Pratishthan College of Engineering in Chembur.

15. It is submitted that, **Complainant, has publicly expressed her interest in explicit sexual activities and behaviors. Evidence from her public Quora profile, where she engaged in discussions about the book 'Fifty Shades of Grey', a well-known erotic novel that explores **BDSM** relationships, shows her interest in such sexual activities.**

16. It is important to note that Complainant's previous conversations, as shown in our collected chat logs, indicated her preference for aggressive and assertive sexual partners.

17. It is submitted that, Evidence from the chat logs also reveals Complainant actively expressing her desire to acquire and read 'Fifty Shades Darker', which is a continuation of the explicit sexual narrative in the 'Fifty Shades of Grey' series.
18. For the record, pursuant to the decision of the pertinent regulatory authorities in the Republic of India, the cinematic adaptation of the literary work known as 'Fifty Shades of Grey' is banned within the jurisdiction of India due to the extreme sexual content involving using sex toys in the same.
19. In chats with Applicant, Complainant can be seen discussing sexual practices and techniques, indicating her active involvement and mutual participation in these discussions.
20. Additional chats suggest that Complainant was teaching Applicant about sexual practices that he was not familiar with, indicating a level of consent and active participation in unconventional sexual discussions and activities.
21. It is put forth that the individual identified as Complainant, due to the constraints imposed by her parental, found it difficult to fulfill her sexual desires until such



time as she entered into marital status, which facilitated an increased measure of personal liberty in this regard. The parental control can be additionally inferred from the fact that Complainant used to give her entire salary to her father before and upto 6 months of the marriage. Moreover, even Applicant was forced to transfer his entire salary until 6 months of the marriage.

22. It is submitted that, In the year 2021, Complainant ordered sex toy, a dildo, the existence and use of which was willingly communicated to Applicant when applicant was in U.S under Fulbright-Kalam fellowship period from Feb 2021 to Oct 2021. She even extended her advice to a third party, referred to as Supriya, who was residing in the United States at the time, encouraging her to purchase a similar device to enhance her own sexual satisfaction. This was communicated to Applicant by Complainant in one of their conversations. The bank account statements and credit card summary of Complainant for the year 2021 should be investigated to validate this fact.

23. It is submitted that, Complainant alleges her mother visited on 26/07/2018 on occasion of her Birthday. However, as substantiated by the telegram chat conversation on 25/07/2018, her mother was already residing with Applicant and Complainant prior to her birthday and stayed for almost six months.

24. It is submitted that, Complainant's accusation of Applicant quarreling with her mother over cooking is contested. Reference to the telegram chat on 25/07/2018 confirms that Applicant inadvertently left behind the food prepared by Complainant's mother, which led to a disagreement initiated by her mother. Upon Complainant's insistence, Applicant apologized, despite not being at fault. The contradiction between the FIR allegations and the documented telegram chat indicates the falsified nature of the complaint.

25. It is submitted that, Complainant maintains that post her mother's departure, Applicant instigated daily arguments and physical altercations. However, telegram chat history for the period following 26/07/2018 counters this assertion. The frequency and warmth of their exchanges indicate a cordial relationship, without any suggestion of abuse or discord.

26. It is submitted that, While Complainant states Applicant vandalized the house, an audio recording indicates the contrary – Complainant was the one causing damage.

27. It is submitted that, Applicant counters Complainant's claim that he imposed a diet on her due to her weight. It was Dr. Harshal Ekatpure, an endocrinologist at Ruby Hall Clinic,

Sasson Road, Pune, who advised weight loss due to her thyroid issues (lab reports attached). This was also to prevent future complications if she decided to conceive, a fact Complainant confirmed without consulting Applicant. After fainting, Complainant was taken to the doctor by Applicant, who respectfully urged her to take care of her health. The doctor's advice was subsequently disregarded by Complainant, as shown in their telegram chat records.

28. It is submitted that, Complainant's weight loss was achieved under a nutritionist's supervision and a strict diet. Even when Applicant advised a balanced diet, Complainant insisted she was following professional advice and disregarded his input. This is also substantiated by their telegram conversations.

29. It is submitted that, the claims that Applicant's mother regularly called to complain about Complainant are unfounded and malicious. Applicant's parents, residing in Delhi, were unaware of the daily happenings in Complainant and Applicant's life in Pune.

30. It is submitted that, Complainant's claims about an altercation involving a water bottle are dispute. Complainant, who had a tendency to make false suicidal threats, Further injured with a water bottle, resulting in a nosebleed is nothing but concocted story. Applicant

intervened to confiscate the bottle and prevented further harm. Audio recordings, provided as part of the evidence, document multiple instances of Complainant making false suicidal threats.

31. It is submitted that, Complainant's assertion that her deteriorating health was due to depression and regular disputes is contested. Medical records and professional observations by Dr. Sudha Desai at Ruby Hall Hinjewadi suggest that her condition was primarily due to food poisoning. None of the medical reports or doctor's observations cite depression as the cause of her health issues. All relevant medical reports and doctor's notes have been included with the evidence.

32. It is submitted that, based on the medical evidence, it is clear that Complainant's assertion about her health deteriorating due to depression is misleading. Her health problems, according to the medical reports, were primarily caused by food poisoning, not depression. Thus, this evidence directly contradicts Complainant's statement in the FIR.

33. It is submitted that, Applicant insists that these factual discrepancies cast significant doubt on the validity of Complainant's allegations. Consequently, he urges the court

to consider these points while evaluating the FIR and its merits.

34. It is submitted that, Complainant's depiction of the events leading to her hospitalization is not accurate. She engaged in extreme dietary practices under the guidance of a nutritionist named Joshua (whose prescriptions are attached), leading to malnutrition and severe health issues. Additionally, Complainant did not regularly take her prescribed thyroid medication (previous such reports are attached with Dr Harshal Ekatpure at Ruby Hall Sasson Road Pune) due to her focus on pursuing her MBA and managing Brand Mender. As a result, she collapsed on 17 July 2020 and had to be rushed to the hospital on Applicant's two-wheeler, given the unavailability of public transportation due to Covid-19 restrictions. En route, Complainant fell unconscious, and upon arrival at Ruby Hall Clinic, Sasson Road, she was treated in the emergency ward due to the absence of available hospital beds. Her blood pressure, which was dangerously low, was stabilized with saline, and she was discharged. However, on 19 July 2020, she again lost consciousness and was readmitted. This time, despite treatment, her condition did not improve, and the decision was made to admit her to Ruby Hall Hinjewadi, a private hospital.

35. It is submitted that, It is critical to note that amidst the pandemic, securing a bed in any hospital was challenging. Despite these hardships, Applicant managed to arrange for her admission in a private hospital, at the expense of his own well-being and financial resources. Applicant travelled over 20 kilometers multiple times a day to the hospital, managing both Complainant's care and the mounting medical bills. In contrast, Complainant's parents and brother did not offer assistance, citing Covid restrictions. Furthermore, the daily hospital charges were exorbitant, almost half of Applicant's monthly income.

36. It is submitted that, Given the high hospital fees and Complainant's deteriorating financial situation due to her business expenditure, Applicant realized that they would be unable to continue affording her treatment at Ruby Hall Hingewadi. Moreover, the hospital was not on the Central Government Health Scheme (CGHS) list, and he could not seek bill reimbursement from his office. During this time, Applicant tried to make arrangements for a bed at AIMS hospital in Aundh, a CGHS-registered hospital. However, Complainant vehemently refused to shift, leading to further financial strain and emotional stress on Applicant.

37. It is submitted that, Complainant's refusal to transfer to the more affordable hospital, combined with her insistence that Applicant was solely responsible for her care and

medical costs, created an untenable situation. This is especially noteworthy given that Complainant's earnings were comparable to or greater than Applicant's at the time. Applicant's suggestion that her parents could assist with the hospital fees was met with hostility.

38. Furthermore, Complainant's claim that her family could not assist due to Covid restrictions is dubious as her brother arrived precisely at the time of discharge on 25 July 2020, implying that travel was possible.

39. In light of these factors, Applicant contends that Complainant's claims in the FIR are not an accurate representation of the events and the circumstances surrounding her hospitalization and subsequent treatment. Therefore, he urges the court to consider these points when evaluating the veracity of the allegations made in the FIR.

40. It is submitted that, in contradiction to Complainant's claim about the scholarship being granted by Applicant's office, it is important to note that it was actually awarded by a third-party agency, the United States India Educational Foundation. This illustrates a lack of attention and interest on Complainant's part in Applicant's career and achievements, as opposed to his diligent care and support towards her.

41. It is submitted that, Complainant's assertion that Applicant refrained from disagreements due to his work-related focus is purely conjectural and subjective, without any evidence to substantiate it. Moreover, this claim contradicts her earlier statement about frequent quarrels from May 2018 to May 2023. Complainant's inconsistency undermines the credibility of her allegations. It is to be noted that Complainant and Applicant stayed separately from 1 February 2021 to 31 October 2021, then from 15 December 2021 to around 15 January 2022 and then from first week of February 2022 to present. The period that she has quoted they stayed together from May 2018 to May 2023 is also contested. While they never stayed together after January 2022, for the 5 years (60 months) quoted by her, they did not stay together for more than 2 years (26 months). The period is artificially inflated to falsely increase the seriousness of her complaint.

42. It is submitted that, The allegation of Applicant inflicting physical harm by hitting Complainant's hand with a pen is unequivocally denied as false and fabricated.

43. It is submitted that, It was Complainant who insisted that Applicant should go alone to America in 2021, under the pretext that both needed time apart. Despite disagreeing, Applicant respected her wish and did not pressure her to accompany him.



44. It is submitted that, with regards to Raunaq, it was impractical and unreasonable to request him to leave the house amidst the Covid-19 peak in 2021, given his ongoing studies in Pune. Since Applicant was in U.S, there was no such incident which are narrated as far as Raunaq is concern as there was no allegations made by complainant at any time during marriage, and present allegations is nothing but to rope in Applicant's younger brother into false and concocted criminal case. It is further submitted that Raunaq is at present in Canada and perusing his MBA from University of Calgary.

45. It is submitted that, Complainant's claim of Applicant asking for money before leaving for America is incorrect. Complainant voluntarily offered financial support, acknowledging her lack of prior contribution to household expenses, EMIs, initial costs, furniture, electronics, and daily expenditures. Evidence attached in the form of bank statements and credit card bills indicate that Applicant financed Complainant's MBA education, her startup Brand Mender, her family's stays in Pune, and several other expenses, in part or full. This provides a stark contrast to her allegations.

46. It is submitted that, Lastly, Applicant denies receiving any complaint from Complainant about Raunaq's behavior

or conduct, whether through phone calls, Telegram, WhatsApp, or any other means of communication. Therefore, Applicant contests these allegations as baseless, false and after thought.

47. In light of these counterclaims, Applicant urges the court to consider the discrepancies in Complainant's allegations and the factual evidence provided, when evaluating the merit of the charges levelled against him in the FIR.

48. It is submitted that, Complainant's assertion that Applicant contacted her only once a month is incorrect. Applicant consistently called and messaged her daily until she threatened to commit suicide. This threat, though it has since been deleted from their Telegram conversation, caused severe mental stress to Applicant. Complainant has confessed to giving the suicide threat to Applicant as evidenced from call recordings and audio recordings between them which are submitted to the Hon'ble court. Call logs verify that Applicant initiated communication while Complainant avoided making any calls in 2021 while Applicant was in America. Furthermore, Complainant has agreed in audio recordings that she neglected to initiate communication, contradicting her claim that Applicant neglected to call on their wedding anniversary.

49. It is submitted that, Recovered WhatsApp chats between Complainant and Applicant show that they used to talk almost every day during his stay in America in 2021, in the first half of his stay.

50. It is submitted that, Complainant's statement about her 14-day quarantine in 2021 is misleading. She fails to mention that despite recovering from severe health issues in 2020 and advice from Applicant, she travelled to Mumbai and then Ahmedabad during the first wave of Covid-19. This led to a disagreement as Applicant was advising her to not to travel after getting discharged from the hospital. Complainant and her parents in forced Applicant to come to Mumbai, in which they disrespected and belittled Applicant and his parents.

51. It is submitted that, In 2021, during the second wave of Covid-19, Complainant again went on vacation despite Applicant's reservations due to the pandemic. As a result, she and her parents contracted Covid-19. Ignoring Applicant's suggestion to recover in Mumbai, she risked infecting Raunaq and their housekeeper, Chaya, by returning to Pune. To protect them, Applicant arranged for Raunaq to move to Delhi. Complainant's allegations against Raunaq are baseless as he left Pune immediately upon her arrival.

52. It is submitted that, These facts illustrate Complainant's consistent pattern of dismissing Applicant's concerns and advice, taking unilateral decisions that put others at risk, and then blaming Applicant for the consequences of her actions. Her accusations against Applicant and Raunaq are attempts to shift responsibility for her actions onto Applicant.

53. It is submitted that, Complainant alleges that while Applicant was in America in 2021, he asked her to pay half the loan on their house. However, this contradicts their bank statements, which show that Applicant continued to pay the EMIs, electricity bill, and maintenance costs for their house in Pune. Furthermore, Complainant has admitted to feeling guilty about not contributing towards household expenses.

54. It is submitted that, Complainant claims that Applicant attempted to sell their house without her consent. However, they had initially mutually agreed to sell the house as part of their plans to immigrate to Canada through the Canada PR entry system, confirmed by the attached WES report. When Complainant's parents expressed disapproval of the sale, she abruptly withdrew from the agreement. Applicant saw a malicious interest of Complainant's parents in the property and then suggested that her parents could buy the property to facilitate their move to Canada. Complainant has confessed in audio recordings that her lawyer was encouraging her to file false cases against Applicant. She

has also been accused of threatening Applicant with these false cases, even going as far as to stage incidents to generate photographic evidence.

55. It is submitted that, these discrepancies between Complainant's claims and the available evidence suggest that she may be deliberately misrepresenting the facts to cast Applicant in a negative light and further her own interests.

56. It is submitted that, Complainant contends that she left Applicant's residence in Pune to live with her mother in Mumbai and Applicant never asked her to return. However, the veracity of this claim is questionable as available audio recordings indicate that every time she left the marital home, Applicant would plead for her return to resolve their issues.

57. It is submitted that, Complainant states that Applicant and his family were invited to Mumbai to negotiate conditions for their reunion. However, it appears that Complainant and her father orchestrated this meeting to exert undue pressure on Applicant and his family, inviting multiple relatives from their side and resorting to public humiliation. Moreover, there was no evidence of Applicant setting conditions for their reunion. Rather she has put condition which was 50% share in flat and demand of 15.5

Lakh rupees, which can be seen from her WhatsApp message.

58. It is submitted that, concerning the dispute over the sale of the house in Pune, Complainant agrees in her FIR that it was her father who ultimately refused the sale. This evidences Complainant's family's undue interference in the couple's marital affairs and property decisions.

59. It is submitted that, Complainant alleges that Applicant and his family imposed conditions on her interactions with her family. However, it is clear from evidence that Applicant's family simply requested minimal interference from Complainant's family in the couple's marital affairs.

60. The FIR suggests that Applicant called and abused Complainant and her parents after September 2022. However, there has been no communication between Applicant and Complainant's parents post the meeting in February 2022. This shows that the complaint is false and just trying to put pressure on Applicant to extract maximum amount of money from him and also get the divorce.

61. Furthermore, documented communication records show continued and cordial conversations between the two in 2023, including shared meals and mutual discussions about personal issues, contrary to her claims of abuse and threats.

62. Complainant's claims about the time period she spent with Applicant are also inconsistent with the actual duration of their cohabitation. While she alleges a period of five years (from May 2018 to May 2023), in reality, they lived together only for about 2.5 years.

63. Lastly, Complainant's accusations against Applicant and his family appear to be an attempt to coerce money from them under the guise of alleged physical, verbal, and sexual abuse. These accusations are baseless and unsupported by any substantive evidence.

64. In light of these findings Complainant's FIR is riddled with inconsistencies, contradictions, and false allegations. The evidence presented by Applicant, including audio recordings, bank statements, and written communications, refute her claims and depict a pattern of manipulation and exploitation. This is a clear misuse of the judicial process to advance personal interests at the expense of Applicant and his family.

65. It is submitted that, the present evidence comprises a series of electronic communications from the year 2021, specifically transcripts of WhatsApp interactions, which ostensibly substantiate the argument that a positive and ongoing relationship was maintained between the parties

herein referred to as Complainant and Applicant. These documented interactions ostensibly contradict Complainant's assertion that their communications were infrequent, occurring merely on a monthly basis in 2021.

66. Furthermore, within the disclosed communications, Complainant has been noted to self-acknowledge a propensity to engage in excessive ruminations concerning the nature of their interpersonal relationship. Such a claim, it might be contended, introduces a degree of subjective bias and uncertainty that could potentially compromise the veracity of Complainant's previous statement regarding the frequency of their interactions. These observations can be noted from WhatsApp conversations between the two parties.

67. It is submitted that, the digital evidence in the form of a screenshot from a WhatsApp conversation dated 7th March 2022, demonstrates that the party referred to as Complainant expressly initiated discussions regarding the termination of the marital relationship, herein referred to as divorce. Additionally, it is evident that Complainant demanded substantial financial remuneration in association with this proposed divorce.

68. It is submitted that, contrarily, the party referred to as Applicant has clearly and categorically denied the validity



of Complainant's claim for the stipulated monetary sum. This information, when analyzed in conjunction, substantiates the argument that Complainant has embarked on a course of action involving the institution of potentially unfounded legal proceedings against Applicant with the possible intent to secure substantial financial gain.

69. It is submitted that, upon review of the available digital records, herein the website of Brand Mender, which Applicant and Complainant co-founded, it is evident that Complainant is formally recognized as the founder of a business entity known as Brand Mender, as per the company's official website. The organization currently employs a workforce of 19 individuals, under the leadership of Complainant.

70. It is submitted that, despite her independent business achievements, Complainant demonstrates a sustained interest in acquiring rights to the property located in Pune, a property developed by Applicant and his father. However, it is noteworthy that Complainant's financial contribution towards this property is minimal, with her having serviced less than five Equated Monthly Installments (EMIs). These payments were made during the calendar year of 2021, a period when she resided at the property by herself in the absence of Applicant.

71. Furthermore, it has been established that during his time away, Applicant bore the financial responsibility for the property's electricity and maintenance costs, despite not residing there.

72. It is submitted that, review of Complainant's personal circumstances and her personal diary indicates a significant emotional struggle upon her relocation to Pune with Applicant in the year 2018. Available evidence suggests frequent episodes of distress attributed to the separation from her parents. Such emotional response may suggest that Complainant was not psychologically prepared for marital commitment at that time.

73. It is submitted that, alleged Coercion through Threats of False Legal Actions: Applicant has submitted audio recordings wherein Complainant can purportedly be heard issuing threats. **Specifically, Complainant is accused of stating that her legal counsel is urging her to instigate a series of fraudulent legal proceedings against Applicant.** These recorded threats, could potentially constitute a form of legal intimidation or coercion.

74. It is submitted that, reference is made to the record of entry dated 21st November 2021 in Complainant's personal diary: Complainant's narrative displays inconsistencies in her recounting of an interaction with Applicant in a public

setting. In her account, she initially indicates that Applicant extended an offer to introduce her to various individuals. Subsequently, however, she paradoxically portrays this same offer as a form of coercion, alleging that Applicant is forcing her into these introductions. **This discrepancy between her initial acceptance of the offer as a courteous gesture and subsequent portrayal of the same as an imposition raises questions about the reliability of her account.** It might suggest a potential tendency to fabricate or misconstrue the events and Applicant's actions, thereby casting doubts on the veracity of her complaints against Applicant.

75. It is submitted that, reference is made to the record of entry dated 23rd April in Complainant's personal diary (Year Likely 2021, Not Explicitly Stated): In the documented account, Complainant appears to project a predominantly negative sentiment towards Applicant, expressing a distaste towards his physical appearance and an apparent emotional disconnection. Specifically, she is quoted as stating, **"Maybe I am negative to pin down all negative emotions. I don't like his face. He is just a known face to me and no feelings for him."** Such openly hostile sentiment, if accurately reflective of Complainant's emotional state at the time, could potentially predispose her to create an unfavorable narrative about Applicant, thereby casting doubt on the objectivity and truthfulness of her claims against him. It is arguable that these statements may point

towards an intent to defame or falsely accuse Applicant, thereby potentially discrediting her allegations.

76. It is submitted that, reference is made to the record of entry dated 11th May in Complainant's personal diary (Year Likely 2021, Not Explicitly Stated): In the account provided, Complainant lays claim to all gold assets provided during the course of the marriage, asserting her parental ownership over these valuables. She affirms that the physical possession of these assets is retained by herself and her mother, even indicating instances of accessing the storage facilities (lockers) without Applicant's knowledge or consent. **Significantly, Complainant's assertion of ownership extends to the gold contributions made by Applicant's mother, which she appears to categorize as belonging to her own parents.** This statement could potentially be construed as a demonstration of disregard for the rights and contributions of Applicant's family, casting doubt over the fairness and validity of her claims pertaining to property and asset division in this marital dispute.

77. It is submitted that, reference is made to the record of entry dated 25th April in Complainant's personal diary (Year Likely 2020, Not Explicitly Stated): **She voices her decision to end her relationship with Applicant and start anew, without attributing any physical or emotional harm from him as the reason. The statement, "Maybe I am wrong, maybe not**

**stable enough to have a partner, maybe not mature," is self-reflective and suggestive of her personal struggles rather than an indictment of Applicant. She also expresses a desire for independence and solitude, distancing herself from both her parents and Applicant.** Of note is her current presence on online dating platforms which she has confessed in one of the audio recordings, which indicates an active search for new partners. **In the same diary entry, she alludes to making a significant life decision post-quarantine, not attributed to Applicant but rather to her individual choices and personal growth.** This record may cast doubts on the validity of her claims against Applicant, as her expressed dissatisfaction appears rooted more in personal struggles than in any alleged misconduct by Applicant.

78. It is submitted that, reference is made to the record of entry dated 14th April 2020 in Complainant's personal diary: **Complainant admits to certain misdeeds and acknowledges causing hurt to others in her narrative. She reveals doubts about her objectives and capabilities pertaining to the sustenance of her marital relationship,** stating "I am unsure of what I want from this marriage and if I can sustain long". Additionally, she expresses personal confusion about her standing in the context of divine favor or punishment, questioning if God still harbors love for her despite her admitted wrongdoings. She is depicted as grappling with the uncertainties and potential repercussions of her actions. **Such**

**admissions of guilt and ambiguity towards the continuation of her marriage may cast doubt on the credibility of her complaints against Applicant, suggesting the possibility that her dissatisfaction may originate more from her own personal struggles and regrets than from any actions on Applicant's part.**

79. It is submitted that, from the undated last entry in Complainant's personal diary, portrayal of events suggests a potential disregard and lack of appreciation on Complainant's part for Applicant's significant efforts and sacrifices made on her behalf during her health crisis. It could be inferred that such behavior could amount to emotional cruelty towards Applicant.

80. It is submitted that, other observations related to recurring Complainant's personal diary entries: (i) Notably, Complainant frequently mentions instances of isolating herself in the bathroom. Such repeated references may suggest a recurring pattern of self-imposed isolation as a coping mechanism, which is worthy of further examination. (ii) **Importantly, a comprehensive review of the diary entries does not reveal any explicit references to incidents of physical assault or harassment. This lack of documented evidence stands in contradiction to her current claims in the lodged complaint.**

81. It is submitted that, attention is drawn to Complainant's aggressive conduct: In relation to accounts of violent behavior by Complainant towards Applicant, evidentiary support is available in the form of audio recordings of their conversations. **These recordings capture Complainant confessing to acting violently towards Applicant, including instances of throwing objects such as a charger at him.** The referenced audio materials are attached and provide substantiation for these claims of aggressive and potentially harmful behavior.

82. It is submitted that, the transcripts of call recordings between Applicant and Complainant for the dates December 12, 2021 at 9:29 pm, 9:44 pm and 11:56 pm are submitted as appendix with this application. Some excerpts are as follows:

*“Jaspreet: There are multiple things, when I speak to the lawyer, lawyer speaks 15 thousand reasons and that is why we have decided not to speak to the lawyer.*

*Manmeet: What lawyer, what reason*

***Jaspreet: Reason means they will come up with topic, they want me to do the false cases. All three people in my house are sitting quiet.***

Manmeet: But you were telling me they are telling you to file false cases against me

**Jaspreet: No no, not they, the lawyer is telling me to file false cases against you. The lawyer asked me to do false cases and my parents won't mind.**

**Dec 12, 2021, 11:56 pm**

**Manmeet:** See, you are only telling that you are strong. But you are being told. You are being told by your parents. To do things against me. **To file false cases against me.** That is what your parents are telling you.

**Jaspreet: That is something the lawyer has told me.** So again and again you are telling me. See, that is the thing. Again and again you are telling me.

**Manmeet: But what have I done to you?**

**Jaspreet: No, you have not done anything wrong to me, why would I go ahead and spoil.** Whatever it is, it is all being cordial right, everything. I have come to a conclusion that if we have to stay, we have to stay in peace, if we have to separate, we have to separate in peace.

Manmeet: Okay fine listen to me what if we I what if I move out of this house what if you come and you stay with me in another house? Will you come then?

Jaspreet: Sure.



**Manmeet:** Does that work?

**Jaspreet:** Yaar but then it's only gonna be you and me because then I don't want people saying I want complete time with you

**Manmeet:** Yaar that I am giving you na yaar will go on immediately first thing will go out na yaar. Yaar but then things take time na yaar I know what you are saying. No what I am understanding what you are saying. **You are telling basically you are asking Ronak to go back right?**

**Jaspreet:** What I am saying is. **And it's not because I have a problem with him** it's because I don't want that third person to us to feel anything that I don't want to have this space for us.

**Manmeet:** I have no expectations to go and sleep with somebody. I have no expectations. I am not even going to feel bad about it. You know about me right? See you are going and talking to guys. I am even fine with that.

**Jaspreet:** I am yeah because you are lost. You are actually lost that say of telling me that you can't go ahead and talk because you know your absence has to be filled by somebody else.

Manmeet: No but whatever it is, see even if it is what I am saying is even if it is not physical,

**Manmeet: even if it is not physical relation you at least had an emotional relationship while you were married.**

**Jaspreet: Yeah whom do I go to then? I am a person who has run my emotions. I am being very clear. You want to consider that to be an extra marital affair. Go ahead and do that. But I have been very honest. I could have not told you.**

**Jaspreet:** You wouldn't have even got to know if I had not told you about it. **You want to go ahead and consider it to be an extra marital affair. Go ahead and do that.** I had absolutely nobody to talk to you. Do you understand the place? You had a friend. You had people around you when you were there. I don't even know if you need people in the first place. Considering how practical you are, you could have been completely okay with not talking to people about your own personal stuff. I am not a person who can do that. I can't keep things within me that they were killing me.

Jaspreet: I needed somebody to talk to me. All I did was all I did was talk to somebody. Now if you find that is a problem,

83. It is submitted that, trust and Relationship Dynamics: Complainant admits that she never trusted Applicant from

the beginning of their relationship and that the lack of trust was not due to any act of Applicant, but rather, it was her nature and perspective.

84. It is submitted that, finances: The conversation elucidates the financial aspects of their relationship. Complainant admits that her contributions to household expenses and mortgage repayments were negligible, contradicting any claims of financial abuse.

85. It is submitted that, false Accusations: Complainant explicitly states that her lawyer is urging her to file false charges against Applicant, providing evidence of a concerted effort to malign Applicant unjustly.

86. It is submitted that, relationship with Raunaq: Complainant categorically denies having any issues with Raunaq, contradicting any allegations of sexual harassment made against him.

87. It is submitted that, Infidelity: Complainant admits to engaging in an extramarital relationship during Applicant's absence, which might provide a motive for her to portray my client in a negative light and break the marriage.