

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 19.04.2022

Time: 04.05 P.M.

Name : Dr. K. Palanivel (PW3)

Age : 46 Years

Father's Name : K. Kaliyaperumal

office Address : A1/B, Sipcot Industrial complex, Kudikadu
village, Cuddalore – 607 005.

Chief Examination by M/s. Cibi Vishnu, Learned counsel for the Plaintiff

Solemnly Affirmed:

I am the Deputy General Manager of the Plaintiff company. I am well acquainted with the facts of this case. I am filing my proof affidavit today and the same may be treated as part and parcel of my chief examination.

Time : 04.10 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date:07.06.2022
Time: 02.50 P.M.

Name : Dr. K. Palanivel (PW3)

Age : 46 Years

Father's Name : K. Kaliyaperumal

office Address : A1/B, Sipcot Industrial complex, Kudikadu
village, Cuddalore – 607 005.

Cross Examination by Mr. S.R. Subramaniam, Learned counsel for the
Defendant.

Solemnly affirmed:

Q1:(Proof affidavit is shown to the witness.) Is this the affidavit filed by
you?

A:Yes.

Q2:How long have you been working in the plaintiff company?

A:19 Years.

Q3:Have you filed any documents to that effect that you are a doctor of
Philosophy in Chemical sciences as averred in para 1 of your affidavit?

A:No.

Q4:Are you deposing as a employee of the plaintiff company here?

A:Yes.

Q5:As what cadre did you join the plaintiff company?

A:As beginee Management trainee.

Q6:Have you filed any document with regard to the chemical reaction in respect to Bromine and creation of fire due to its volatility by way of any literature or any research paper?

A:Yes. I shared material data sheet.

Q7:Other than that you have not produced anything?

A:Yes.

Q8:(Proof affidavit is shown to the witness.) Have you filed any documents substantiating the averments made in para 4 of your affidavit?

A:No. Witness adds: However that Solara Active Pharma sciences is manufacturing APS and intermediates.

Q9:Prior to joining plaintiff company did you work any where?

A:Yes. I have worked in Vanavil Dyes.

Q10:Have you produced any research paper or article written by you before this court?

A:No.

Q11:Normally when you place an order for Bromine how many days will it take for delivery?

A:I have to check it.

Q12:(Proof affidavit is shown to the witness.) Have you filed any documentary evidence to substantiate the averments in para 6 of your affidavit?

A:I have to check it.

Q13:Do you agree that Bromine is not utilized for manufacturing all the products in the plaintiff company?

A:Yes.

Q14:Are you present on the date of occurrence 07.03.2011?

A:Yes.

Q15:Whether the storage of Bromine under your control and supervision?

A:No. It is not under my control. Under the control of the company.

Q16:What are your working hours?

A:09.30 Am to 06.00 Pm.

Q17:(Proof affidavit is shown to the witness.) Can you recollect at what time the Bromine leakage is started?

A:It is difficult for me to recollect. The incident happened at 07.30 Am. Witness changed and stated that at 07.30 Pm as per records.

Q18:After coming to know about the leakage of Bromine, what did you do?

A:I could not reach that place, people were working to resolve that.

Q19:Before arrival of fire rescue department, what steps did you take?

A:After coming to know about the incident our management communicated to the concern departments to resolve the issue.

Q20:(Proof affidavit is shown to the witness.) Is it correct to state that Bromine packed in sawdust does not get absorbed by sawdust?

A:Yes.

Q21:In para 9 you have stated contra to para 8 that spilling of Bromine on to the sawdust could have caused the fire?

A:No. There is no contradiction. There was a fire.

Q22:Have you filed any documentary evidence to substantiate the amount of Bromine consumed due to the incident?

A:I have not provided the quantity. Upon inspection our management has provided howmuch has been consumed after investigation.

Q23:Do you agree that the cause of leakage of Bromine is due to the impact of stacking of crates one over the other and consequent to that the bottles were broken?

A:Yes.

Q24:How much water was used to control the fumes?

A:I have to check.

Q25:What is the thickness of the bottle where Bromine was stored?

A:I need to check.

Q26:Do you agree usually its kept in a thick bottle for safety reasons?

A:Yes.

Q27:Do you agree that the release of fumes in the bottle caused irritation and vomiting to the people in and around the factory?

A:Yes.

Q28:Do you agree that the closure of the factory was due to order of the government?

A:Yes.

Q29:(Proof affidavit is shown to the witness.) Can you show any documentary evidence to substantiate that the defendant had filed to show that smokes without fire and an entire building can be burnt without fire?

A:I need to check.

Q30:(Proof affidavit is shown to the witness.) Have you filed any documentary evidence to substantiate the averments in para 12?

A:It is in the Data sheet.

Q31:What is the area of the store room where the Bromine was kept?

A:It is a big area. I have to check to say the measurement.

Q32:Are you aware of the Writ petitions filed by your company?

A:I am not aware.

Q33:Have you gone through the survey report and the preliminary survey report?

A:No.

Q34:Are you part of the accident investigation report on dated 12.03.2011?

A:No.

Q35:Were Ammonia, Acetic acid, Grease paper stored in room no.3?

A:No.

Q36:Do you know that the claim for damages for the value of Bromine has been repudiated?

A:I am not aware.

Q37:Is the Ex.P6 filed by your company?

A:Yes.

Q38:(Proof affidavit is shown to the witness.) Are you aware that only upon the undertaking given by your company before the Hon'ble Court the factory was reopened?

A:I need to check.

Q39:Is Vimal Kumar part of your company?

A:Yes. At that time of incident.

Q40:I put it to you that since you are an employee of the plaintiff company you cannot be treated as an expert witness.

A:I deny.

Re-examination Nil.

Time : 03.45 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 26.07.2022

Time: 01.20 P.M.

Name : Mr. V. Arul (DW1)

Age : 63 Years

Father's Name : N.V. Velayutham

Residential Address : No.5, Saibaba street, Delarshpet,
Puducherry – 605 009.

Chief Examination by Mr. S.R. Sundar, Learned counsel for the Defendant.

Solemnly Affirmed:

I am the preliminary surveyor. I am well acquainted with the facts of this case. I am filing my proof affidavit today and the same may be treated as part and parcel of my chief examination.

Time : 01.30 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 25.08.2022

Time: 03.00 P.M.

Name : Mr. V. Arul (DW1)

Cross examination by B. Giridharan, Learned counsel for the Plaintiff

Solemnly affirmed:

Q1: What is your qualification?

A: B.E (Chemical Engineering)

Q2: How long have you been an independent surveyor?

A: 33 years.

Q3: Per year, on an average how many surveys do you do for New India Assurance Company Ltd?

A: About 15 surveys per year.

Q4: Are the survey you primarily do for fire insurance?

A: Yes, for fire, marine and engineering.

Q5: In your career have you dealt with Bromine leak survey?

A: No.

Q6: Are you aware for what purpose liquid bromine is used for by the plaintiff?

A: No.

Q7: Are you aware how liquid bromine is stored and transported?

A: Yes.

Q8: How is it stored and transported? Please clarify?

A: It is kept in the glass bottle surrounded by sawdust and packed in

wooden boxes.

Q9: Why is it kept in sawdust?

A: For cushioning purpose.

Q10: In this case in the factory of the plaintiff in room No.3 how were the bromine bottles stored?

A: I do not know.

Q11: When did you survey the factory of the plaintiff?

A: 09.03.2011.

Q12: What kind of policy does the plaintiff have with the defendant?

A: Standard Fire and special perils policy for material damage and loss of profit.

Q13: In this case, is it correct to state that the bromine causes heat when exposed to atmospheric temperature?

A: Yes.

Q14: What happens when bromine leaks and comes into contact with sawdust?

A: It generates heat.

Q15: Can you specify more accurately what kind of heat is generated?

A: It generates low heat.

Q16: The glass bottle in which the bromine was stored comes with lid, what kind of lid was it?

A: Plastic.

Q17: Is it correct to state that the bromine bottle is covered with the plastic lid because plastic is inert to bromine?

A: I doubtful and I do not know.

Q18: (Ex.P12 is shown to the witness) To cause melting of the plastic lid on the bromine bottles should not the temperature be high?

A: Not necessary. Constant heating makes the lid to melt.

Q19: (Ex.P12 is shown to the witness) For Q.No.10 you stated you do not know how the bottles were stored in Room No.3 then on what basis did you say that there was carelessness and overstocking and failure during transit?

A: I did not know how the goods were stacked when I went because the room was empty. Only with the guessing and discussion with the insured representatives, I understood and based on the same I gave my opinion.

Q20: Have you read the policy terms and conditions?

A: Yes.

Q21: If there is fire will there be damage due to heat?

A: When there is fire there will be damage due to heat.

Q22: (Ex.P12 is shown to the witness) I put it to you that damage was caused due to heat, is it correct?

A: Yes, it is correct.

Q23: (Ex.P2 is shown to the witness) Is there any exclusion clause for damage caused due to heat?

A: No, it is not there in this policy.

Q24: If there is no exclusion clause for damage caused due to heat then there is no basis for rejection of claim.

A: I disagree.

Q25: I put it to you that your survey report has been deliberately given to reject the claim even without seeing how goods were stored?

A: I disagree.

Q26: I put it to you that since you do 15 surveys on an average for New India Assurance company, you have deliberately given one sided survey report.

A: I disagree.

Q27: (Ex.P12 is shown to the witness) Are you aware how the bromine bottles were transported?

A: Yes.

Q28: How were they transported?

A: By truck.

Q29: When were they transported?

A: On 06.03.2011.

Q30: did you see the discharge of the bromine bottles from the truck to the factory?

A: No.

Q31: Then how do you say there were cracks in the bottles due to transit?

A: From the discussion that I had with the insured's employees.

Q32: Have you stated so in para 5 of Ex.P12?

A: No.

Q33: In view of para 5 of Ex.P12, are you saying that though the bromine was carried in bottles on sawdust in wooden crates, the same was incorrect.

A: The thickness of the external box should be higher for withstanding jolting.

Q34: Have you stated so in your report?

A: I have just stated that packing methods should be improved, particulars not given.

Q35: What was the mandate of your survey given to you by new India assurance company?

A: For preliminary survey.

Q36: In the preliminary survey, are you expected to give your opinion on the admissibility of the claim?

A: Yes.

Q37: Have you filed the requisition by new India assurance company asking you to conduct the preliminary survey?

A: No. Only oral by telephonic conversation I was instructed.

Q38: Who are M/s. Cunningham and Lindsey?

A: I do not know.

Q39: Did you see the fire report?

A: No.

Q40: I put it to you that your survey report is incomplete because you have not even seen the fire report.

A: I disagree. Witness adds: Since its a preliminary survey it should have been given within a short time.

Q41: I put it to you that since you were forced to give survey report within a short time, you have not given the findings by applying your mind.

A: I disagree. Witness adds: because they have to give a final finding.

Q42: Are you aware who gave the final finding?

A: No.

Q43: (Ex.P12 is shown to the witness.) Have you stated that this is a preliminary survey report?

A: Yes. The report says it is PRL-01, which means preliminary.

Q44: I put it to you that the survey report is concocted and its deliberately made to reject the claim.

A: I disagree.

Re-examination Nil.

Time : 03.45 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 14.10.2022

Time: 12.20 P.M.

Name : Mr. V. Murali Maran (DW2)

Age : 62 Years

Father's Name : P.K. Venugopal.

Residential Address : No.8/D, Krishnappan street,
Villupuram – 605 602.

Chief Examination by Mr. S.R. Sundar, Learned counsel for the Defendant.

Solemnly Affirmed:

I am the Insurance claim Investigator. I am filing my proof affidavit today and the same may be treated as part and parcel of my chief examination.

Time : 12.23 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 09.11.2022

Time: 12.55 P.M.

Name : Mr. V. Murali Maran (DW2)

Cross examination by P. Giridharan, Learned counsel for the Plaintiff

Solemnly affirmed:

Q1: How long you have been as insurance claim investigator?

A: 30 years.

Q2: In your 30 years experience how many claims have you investigated for New India Assurance?

A: About 1000 cases.

Q3: When were you appointed as investigator for this case concerning fire at the plaintiff's factory?

A: I do not remember the date but around 2017.

Q4: Do you know when the suit was filed?

A: I do not know.

Q5: What was your work as an investigator in this matter?

A: I obtained certain details via RTI from fire and rescue services and filed in this case.

Q6: When was the written statement filed in this case, was it in 2017?

A: I do not know.

Q7: Is it correct to state that the documents you filed in this case were obtained only in 2019?

A: Documents were obtained in 2017 itself.

Q8: Have you filed your investigation report?

A: There is no investigation report as such. I only obtained documents from fire and rescue service and had submitted them.

Q9: I put it to you that the documents you were submitted have been filed after the written statement only to cover the loop holes.

A: I deny.

Q10: I put it to you that since you have done more than 1000 cases for New India Assurance you are biased.

A: I deny.

Q11: Why did New India Assurance engage you for obtaining documents from fire and rescue services?

A: For the purpose of getting documents under RTI Act.

Q12: Do you know about RTI act?

A: I do not know fully but I know if details are asked they will give.

Q13: I put it to you that you are put up witness.

A: I deny.

Re-examination : Nil

Time : 01.05 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 22.12.2022

Time: 01.10 P.M.

Name : Mr. J. Rajan (DW3)

Age : 55 Years

Father's Name : P. Jayaram

office Address : 21D, 2nd floor, A.R.K. Colony, Eldams Road,
Alwarpet, Chennai -18.

Chief Examination by Mr.A.S. Subramanian, Learned counsel for the
defendant.

Solemnly Affirmed:

I am a Surveyor and Loss Assessor with license issued by IRDAI and was employed as Execution Director in Chunningham Lindsey International Insurance Surveyors and Loss Assessors Pvt. Ltd and I have conducted the survey of the Plaintiff company. I am well acquainted with the facts of this case. I am filing my proof affidavit today and the same may be treated as part and parcel of my chief examination.

Time : 01.15 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 16.02.2023

Time: 02.30 P.M.

Name : Mr. J. Rajan (DW3)

Continuation of chief Examination by Mr.A.S. Subramanian, Learned counsel for the defendant.

Ex.D9 is the original board resolution dated 19.12.2022 (The learned counsel for the plaintiff has objected that it is not filed along with the written statement.

Cross examination by H. Siddarth for P. Giridharan, Learned counsel for the Plaintiff

Solemnly affirmed:

Q1: What is your qualification?

A: I am a Mechanical Engineer, Cost Accountant and Fellow in insurance.

Q2: Since you are a Mechanical Engineer, are you well versed with Chemistry?

A: Yes.

Q3: When did you visit the plaintiff's plant?

A: On 29.03.2011.

Q4: Did you visit the plant immediately after the fire accident?

A: We were appointed on 22.03.2011. we contacted the plaintiff and they asked us to visit their corporate office on 24.03.2011 for a meeting. Then an appointment was given to us to visit the plant on 29.03.2011.

Q5: Is Bromine capable of reacting and causing heat?

A: the reactivity level of Bromine is zero this is as per the technical data and safety instructions displayed in the store room of the insured.

Q6: Can you explain what is an oxidizer?

A: Oxidizer tends to react with any other matter or material that it comes into contact with.

Q7: Is Bromine an oxidizer?

A: As per data available No.

Q8: Is it correct to state that if Bromine reacts with other substances then it can cause fire?

A: No.

Q9: Was the Bromine packed in wooden cases at the plaintiff's premises?

A: Bromine liquid was supplied in glass bottles, packed inside the wooden crates with sawdust and Nylon straps in the outside of the wooden crates.

Q10: I put it to you that Bromine reacted with wood and caused fire since it is an oxidizer.

A: I deny.

Q11: Were the wooden crates at the plaintiff premises were damaged or not?

A: Most of the wooden crates recovered from the room were intact and not damaged.

Q12: Is it correct to state that the burning temperature of Nylon is more than wood?

A: I cannot comment.

Q13: Is it possible that wood got burnt but the Nylon did not?

A: No.

Q14: Therefore is it possible that there could have been fire resulting in the burning of wood?

A: No.

Q15: Is it correct to state that wood cannot burnt itself?

A: Yes.

Q16: Is it correct to state that only if heated wood would burn and cause fire?

A: It requires ignition and combustion.

Q17: Since Bromine is capable of reacting and causing heat does the heat cause fumes?

A: It is other way. If Bromine escapes and leaks from the container it emanates fumes.

Q18: I put it to you that these fumes and heat caused the fire.

A: No. There were only fumes.

Q19: I state that the survey report which stated that there was no fire is wrong.

A: I deny.

Q20: I put it to you that you wrongly rejected the claim of the plaintiff.

A: I deny.

Re-Examination: Nil.

Time : 02.50 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 11.04.2023

Time: 03.25 P.M.

Name : Mr. M. Ramesh Babu (DW4)

Age : 49 Years

Father's Name : Mr. G. Marimuthu

office Address : Regional office of the defendant company,
Mumbai.
previously in the Chennai Regional Office at
No.770A, Spencer Towers, 3rd floor,
Anna Salai, Chennai -2.

Chief Examination by Mr.S.R. Sundar, Learned counsel for the defendant.

Solemnly Affirmed:

I am presently working as Regional Manager in the Regional office of the Defendant company at Mumbai. In 2006 to 2012 I was working as Assistant Manager in the Defendant's company at Chennai Regional office and processed the claim and I am well acquainted with the facts of this case. I am filing my proof affidavit today and the same may be treated as part and parcel of my chief examination. The following documents are marked as exhibits.

Ex.D10 is the original authorization letter dated 10.04.2023 (The learned counsel for the plaintiff has objected and stated that this document may be marked subject to objection since the same is not stated in the written

statement).

Ex.D11 is the original policy bearing no.712800/11/09/12/00000902 with terms and conditions for the period 31.03.2010 to 30.03.2011.

Ex.D12 is the original policy bearing no.712800/11/09/07/00000904 with terms and conditions for the period 31.03.2010 to 30.03.2011.

Time : 03.35 P.M.

Time : 04.00 P.M

Solemnly Affirmed:

Ex.D13 is the printout of the letter received from the plaintiff Cuddalore Divisional Office to the Regional Officer of the defendant by fax dated 09.03.2011 along with 65B certificate.

Ex.D14 is the original survey report dated 30.06.2011 (Copy of the survey report is already marked as Ex.P13).

Time : 04.10 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 17.10.2023

Time: 02.40 P.M.

Name : Mr. M. Ramesh Babu (DW4)

Cross Examination by Mr. P. Giridharan, Learned counsel for the Plaintiff

Solemnly Affirmed:

Q1: From when have you been associated with this case?

A: I have been associated in this case from the beginning.

Q2: When did the fire occur in this case?

A: On 07.03.2011.

Q3: At that time were you incharge of the Chennai branch for this case?

A: No. At that time I was in Chennai Regional Office.

Q4: So, is it correct to state that your knowledge of this case is based upon documents?

A: Yes.

Q5: Which of the documents filed along with the written statement have you marked as exhibits with your proof affidavit?

A: I do not know. I have to check.

Q6: Who prepared this proof affidavit?

A: My advocate prepared my proof affidavit.

Q7: Do you have a qualification in Chemical engineering or chemistry?

A: No. Chemistry is one my subject in engineering.

Q8: What engineer are you?

A: Electronic and communication.

Q9: What do you work as with the defendant?

A: Currently I am working as a Chief Manager at head office, Mumbai.

Q10: Do you have any knowledge of surveying chemical fires?

A: Yes.

Q11: Are you also a qualified surveyor?

A: No.

Q12: Please tell me what is the difference between fumes causing heat and smoke caused by fire?

A: When there is a fire there will be a spread of smokes. When there is emanation of fumes it may generate heat.

Q13: (Ex.P7 is shown to the witness) In Ex.P7 has Mr. Devirajan stated that the crates were failed to be stored in a responsible or reasonable manner?

A: No.

Q14: (Proof affidavit is shown to the witness) Then on what basis in para 11 have you stated that Mr. Devarajan of the plaintiff confirmed that the cause for gas leak was failure to stack the crates in a reasonable and responsible manner?

A: I do not know.

Q15: I put it to you that you have no knowledge of the incident.

A: I deny.

Time : 03.00 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III

BEFORE THE ADDITIONAL MASTER-III
HIGH COURT, MADRAS.

C.S.No.412 OF 2013

Date: 23.01.2024

Time: 02.45 P.M.

Name : Mr. M. Ramesh Babu (DW4)

Continuation cross Examination by Mr. H. Siddardh, Learned counsel for the Plaintiff

Solemnly Affirmed:

Q16:Are you aware what kind of policy was taken by the plaintiff from the defendant company?

A: It is a Standard Fire and Special Peril policy for stocks and consequential insurance policy.

Q17:Have you read the terms and conditions of the insurance policy?

A:Yes.

Q18:Is it Correct to state when bromine leaks and comes into contact with saw' dust it generates heat?

A: It generates fumes.

Q19:Did you visit the premises of plaintiff company when the fire incident occurred?

A:I had visited after the incident.

Q20:Can you tell accurately as to when did you visit the plaintiff premises?

A:I don't recollect the date.

Q21:In your career have you dealt with claims relating to bromine leaks?

A:No, I have handled claims of many chemical industries.

Q22: Do you know how a liquid bromine is stored and transported?

A: As per survey report it is stored in glass bottles and transported through carrying truck to insureds factory

Q23: (Ex.D13 is shown to the witness) Did you receive the letter from the plaintiff company personally?

A: Yes.

Q24: How did you receive this letter, Ex.D13?

A: Through Fax.

Q25: I put it to you that you did not receive this letter it was received by Mr. A.S. Subramanian.

A: No. It was sent to our office by fax and it was marked to the concerned department.

Q26: Is it correct to state that if Bromine reacts with other substances it can cause fire?

A: I have no idea.

Q27: I put it to you that Bromine reacted with wood and caused fire since it is an oxidizer.

A: I deny.

Q28: I state that the survey report in which it was stated that there is no fire is wrong.

A: I deny.

Q29: I put it to you that you have wrongly rejected the claim of the plaintiff.

A: I deny.

Re-examination : Nil.

Time : 03.10 P.M.

Taken down in open Court, read over and explained to the witness and the same is admitted by the witness to be correct and signed before me.

ADDITIONAL MASTER-III