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**IN THE DISTRICT COURT OF COLOMBO**

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HOTEL DEVELOPERS (LANKA) LIMITED  
Colombo Hilton Sports Complex,  
Echelon Square,  
Lotus Road,  
Colombo 1.

PLAINTIFF

Case No. 15322/MR.

Vs.

NIHAL SRI AMERESEKERE  
No.167/4, Sri Vipulasena Mawatha,  
Colombo 10.

DEFENDANT

I, CORNEL LIONEL PERERA, of Hotel Developers (Lanka) Limited, Echelon Square, Lotus Road, Colombo 1, being a Christian, do hereby solemnly, sincerely and truly make oath and declare as follows:

1. I am the deponent abovenamed and the Chairman and Managing Director of the Plaintiff Company and swear to the undermentioned matters of my personal knowledge.
2. I state that all the interrogatories required to be answered only by Messrs Suren Wickremasinghe and A.S.M. Perera, being two of the 6 directors nominated by the present Government to the Board of Directors of the Plaintiff Company are mala fide and maliciously filed by the Defendant.
3. Further, I state that all the said Interrogatories are misconceived as per section 98 of the Civil Procedure Code and/or irrelevant to the matter and/or not sufficiently material at this stage.
4. I further state that the Defendant is not entitled at this stage to file by any way of Interrogatories questions that should be and/or could be answered in cross-examination by the witness or witnesses to be called on behalf of the Plaintiff Company.
5. Further, I state that the Defendant is indulging in seeking information through Interrogatories filed by him and that the Defendant is not entitled to do so.
6. As Suren Wickremasinghe and A.S.M. Perera who have been named to answer the Interrogatories are two Directors appointed by the Government, partisan to the Defendant, I state that the Defendant has filed the said Interrogatories with the fraudulent and/or malicious and/or mala fide intent of obtaining answers favourable to the Defendant thereto.

7. According to the foregoing facts, I state that the Plaintiff Company is not bound to answer and/or can refuse to answer the said Interrogatories

the foregoing Affidavit having }  
been read over and explained and }  
the same having been understood }  
sworn to and signed at Colombo }  
on this 15th day of June 1995 }

SGD./ .....

BEFORE ME

SGD./ .....

JUSTICE OF THE PEACE