



TRIAL ADVOCACY PROBLEM:

State of Maharashtra vs. Mrs. Meena Avinash Shetty

In the Court of the Principal Sessions Judge, Greater Bombay.

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EXHIBIT 1

FIRST INFORMATION REPORT

(under Section 154 CrPC)

1. District: *West Mumbai* P.S: *Colaba Police Station* Year: *2014*
FIR No: *645 of 2014*
Date of occurrence: *16.June.2014*

2. Act: *Indian Penal Code, 1860* Sections: *302, 309*

3. Occurrence of Offence, Day: *Monday 16.June.2014* Time: *8.40 pm*
4. Information recorded at PS: Date: *16.June.2014* Time: *11.30 pm*
General Diary Reference Entry No: 1178/2014
Information recorded by: *Asst. Police Inspector Rishi Mattu*

5. Type of information: Personal * Written / Oral: *written*

6. Place of Occurrence: Direction / Distance from PS: *Cosy Castle building, Flat 401, 4th floor, 24 Shahid Bhagat Singh Road, Mumbai 400005.*

7. Informant Name: *Mr. Avinash Shetty* Father's name: *Ramesh*
Date of birth: *27.April.1988* Nationality: *Indian*
Occupation: Businessman
Address: *Cosy Castle building, Flat 401, 4th floor, 24 Shahid Bhagat Singh Road, Mumbai 400005*

8. Basis on which FIR is lodged: *Information provided by Mr.Avinash Shetty*

9. Details of Known / Unknown / Suspected accused with particulars:
Known person – Mrs. Meena Avinash Shetty

9. Reasons for delay in reporting by informant: - *no delay, informed immediately*

10. Particulars of injuries sustained: *Nil*

11. Particulars of the post mortem report: *Not yet received*

12. Inquest report / Unnatural death case no. if any:

FIR read over to the complainant/informant, admitted to be correctly recorded and a copy given to the complainant/informant free of cost.

13. Signature/thumb impression of complainant/informant: *Signed Avinash Shetty*

14. Signature of Office-in-charge, Police station: *Signed Sr PI Ravi Maniyar*

15. Date and time of despatch to the Court: *17.June.2014 at 12.30 pm*

Statement of the Complainant

PW1 - Mr. Avinash Ramesh Shetty (Complainant)

Sex: Male

Age: 32 yrs

Occupation: Horticulturist

Statement: I am Mr. Avinash Shetty, S/O Mr. Ramesh Shetty, residing at Cosy Castle, flat #401, 4th floor, 24 Shahid Bhagat Singh Marg, Colaba, Mumbai. I own a chain of horticulture stores, called 'Green Belt Pvt Ltd' and am currently consulting for the landscaping of two properties in Alibag. I have been running my business for the last 8 years.

I am married to Mrs. Meena Avinash Shetty since the past 9 years. It was an arranged marriage. We have one child, a daughter Nishika who is 4 years old now. She was born with Downs' Syndrome. At the time of my wife being pregnant she had been taking some ayurvedic tablets which my parents and I were not aware of, and which the doctors believed might have caused the genetic disorder in our child.

I live with my parents, Ramesh and Malti Shetty. I am their only son. We continue to live with my parents so that Meena could get support for taking care of our daughter, and my father insists that we must live with them so as to assist them financially, since he is now ageing.

Lately Meena has been complaining a lot about taking care of Nishika. She says that my mother does not help her and refuses to allow her to keep a full time maid to help with Nishika and the domestic chores. For this reason, we have been arguing a lot, as I did not feel it correct to approach my mother and ask her why she is not helping, and I did not feel we could afford to keep one more domestic. Since the past two to three months when I would return home from

work, Meena would frequently pick a quarrel with me under one pretext or the other and then break into racking sobs and tell me that she was so fed up of her life that she no longer cared to live. I would try and calm her down and remind her that our daughter needed special attention along with both our care to carry on in life. Often exasperatedly she would tell me that she wished that Nishika was a normal child as her illness had drained all happiness and joy from Meena's life. I would only try and pacify her as best as I could, since I too knew that Nishika was taking a toll on our marriage and finances also.

On 16.June.2014, I returned home from work early, as my father had asked me to accompany him to the Radio Club for a meeting with his friend, Savlaji, who is a property investor. When I returned home early, Meena was in a bad mood, and she immediately started nagging me about Nishika and the maid. We had an argument, where she told me in no uncertain terms that if I did not tackle my parents and get her domestic help I would be very sorry for the rest of my life. I just dismissed the entire argument as being a routine one where my wife was again in an hysterical mood, after which I had lunch and left with my father for the meeting . My mother was out, but she returned just before we left, so I asked her to keep an eye on Meena. I then left with my father at about 4.30 pm. Meena did not even say bye to me as she was in such a bad mood. Nishika does not talk much to me anyways, since she seems to fear me. This fear has been put in her mind by my wife, I am certain.

When I returned from the Radio Club I saw the bedroom door was still closed, but I did not go into my room, instead I sat down to watch the news, and just rested a while before dinner. My mother said she had not seen or heard Meena all evening and that Meena was in our bedroom and so she must be fine.

When dinner was served at 8.30 pm I went to get Meena and Nishika because my father insisted we must all sit for meals together. I opened the door and went into the bedroom. It was dark, so I turned on the lights, and saw my wife and daughter sleeping on our double bed, both were facing each other and on their sides. I called out to them, but they did not respond. I then went to shake my wife to wake her. Meena did not respond, and her body seemed lifeless. I then leaned over to look at my daughter and found some white liquid near her mouth. The bed was in a mess and I saw broken glass on the floor. Fearing something was wrong, I ran out to call my parents. All three of us then tried to wake them but they appeared unconscious. My father shouted at me to call the police, so I did. I do not remember what the time was.

The police came at about 9.00 p.m. and I cooperated with the police and guided them around the flat and my bedroom. My wife and daughter were removed by the police to hospital in an ambulance which the police summoned. I do not know why, when or by whom the tin of Baygon and Harpic was placed in my bathroom sink cabinet. I do not normally need to open that cabinet since I do not look after the cleaning materials and that is all that is normally kept there.

After drawing a panchnama in my Flat, the police asked me to accompany them to the Police Station, which I did. At the Colaba Police Station my statement was recorded by Asst. Police Inspector Rishi Mattu and thereafter I was allowed to go.

My wife has been strange and moody for some time now so I would not be surprised if she tried to do something to herself and our child. She is unnaturally protective about Nishika, and has created a divide between me and my daughter. I have often told Meena to go stay with her mother in Kolhapur for a break, but she refuses to go.

I state that I was out of the house from 4.30 pm. to 8.00 pm. and during the intervening period, no other person had entered my bedroom to my knowledge except my wife Meena, who was in the bedroom all afternoon with my daughter Nishika. The only person present in the house during this time was my mother, who had returned at around 4.20 pm. before we left.

I state that my wife Meena, who was in a very disturbed state of mind, has tried to end her own life and also has given some poisonous substance to my daughter as she was fed up of taking care of Nishika due to her health problems and request that she be dealt with in accordance with the law.

Sd/-
API Rishi Mattu

Sd/-
Avinash Shetty

SCENE OF OFFENCE PANCHNAMA

NB. This document will have to be proved and exhibited in evidence by the Prosecution.

Pancha No 1.

Date: 16.June.2014

Mr. Mukesh Palya, age 29 years

Residing at: Room # 11/1, Navy Quarters, 112 Shahid Bhagat Singh Marg, Colaba, Mumbai 400005

Pancha No 2

Mr. Prabhu Sinha, age 44 years

Residing at: Flat # 202, Cosy Castle, 24 Shahid Bhagat Singh Marg, Colaba, Mumbai 400005

We the above-named panchas were called by API Mathu to the flat of Mr. Ramesh Shetty, i.e. Flat 401, 4th floor, Cosy Castle building at 9.10 pm on 16.June.2014. When we reached there, Sr. PI Maniyar was present along with 1 other male police officer, and 1 female police officer. He informed us that one minor Ms. Nishika Shetty had been found unconscious in the northwest bedroom, along with her mother Mrs. Meena Avinash Shetty. They requested us to act as panchas to the search of the bedroom, to which we agreed.

The said Flat No 401 is a 2 bedroom flat. As one enters the flat there is a hall measuring 20 ft X 15 ft. and towards the south west corner of this hall, on the right hand side is a large kitchen. On the same right hand side but towards the northwest direction is one bedroom. This bedroom is the room of Mr. Avinash Shetty and his wife Mrs. Meena Avinash Shetty. There is a second bedroom towards the left hand side in the north east direction. This bedroom is the room of Mr. Ramesh Shetty and his wife Mrs. Malti Shetty. Both bedroom doors are closed.

The bedroom door of Mr. Avinash Shetty is closed, but unlocked. This said bedroom measures 15 ft X 12 ft. To the right side of the room is a double bed with bedside tables on either side. On the left side of the room are two large Godrej cupboards, and the entry to a bathroom. On the far wall, next to a balcony door is a single bed, with a small cupboard next to it. Lying on the

double bed, in an unconscious state was one young woman and a female child. The two persons were identified as Ms. Nishika Shetty, d/o Mr. Avinash Shetty and her mother Mrs. Meena Avinash Shetty. The female child had some clear bubbly liquid coming out of her mouth. The police immediately summoned an ambulance and shifted them to hospital.

The bed was in a mess. The bedsheet had been torn and crumpled and was partially hanging off the bed. Two pillows were lying on the floor at the foot of the bed, next to which was some clear broken glass pieces. To the left of the bed, on the bedside table there was a half full water bottle, one glass and a tissue box. There were some medicines in the drawer of the bedside table, (1 strip of crocin, and one partially used strip of calmpose). There were many used discarded tissues on the floor. One had some blood stains. The police seized and sealed the blood stained tissue before us.

Upon entering the bathroom we noticed a bathroom sink with a storage cabinet below. Upon examination of the contents of the cabinet API Mattu found a half full tin of pesticide Baygon and a small bottle of Harpic toilet cleaner. The police seized and sealed the Baygon container and the Harpic bottle in our presence. Except for the above articles nothing else was seized by the police in our presence.

The panchnama was conducted in a peaceful manner and it was concluded at about 10.30 p.m. on 16.June.14. Panchnama was written by API Mattu. Both of us panchas have read the contents of the panchnama. The same is correctly recorded.

Signed API Mattu

Signed Panch No 1

Signed Panch No 2

STATEMENTS UNDER S. 161 Cr.P.C.

The statements of PW2, PW3, and PW4 are the statements that have been recorded under S. 161 Cr PC.

2. PW2 - Mr. Mukesh Palya

Sex: Male Age: 29 yrs Occupation: Watchman at Cosy Castle

Statement: I have been working with the Forces One Security Agency for the past two years. I have been the building watchman at Cosy Castle since the last one year and know all the residents of the building. On 16.June.2014, I was doing the afternoon shift, so I came on duty at 3.00 pm and was required to remain on duty till 11.00 pm. At about 3.00 pm Mr. Avinash Shetty came home from outside. I remember the time because normally Mr. Shetty junior comes back much later in the evening on working days. Mrs. Shetty senior's car was not there when I came on duty, but she drove into the building compound after her son got home. At 4.30 pm both Avinash Shetty and his father left the building together. They were driven by their driver Arun. I did not see Mrs. Meena Shetty or little Nishika that day. Both the Shetty men returned in the night at about 8.00 pm, and I noted that they drove themselves.

At about 9.00 pm suddenly there was a lot of commotion and four policemen came to the building. The Senior Inspector Maniyar told me they had been called by the people in Flat #401. I told them that was the flat of Mr. Ramesh Shetty who lived with his wife and his son and family. They proceeded up to the flat. I accompanied them.

When we got to the flat, before we could ring the doorbell, the front door was opened. I could see Mrs. Malti Shetty was sitting at the dining table and was wrapping a bandage on her son, Mr. Avinash's arm, which appeared to be

injured. I think it was the right wrist that was being bandaged. I asked Mr. Avinash Shetty what had happened to his arm, but he did not give me any reply. The Inspector told me to wait outside, and not to let anybody enter or exit the flat.

At about 9.10 pm, Inspector Mattu asked me to come into the flat and act as a panch, since there seemed to have been a crime committed in the said flat and they needed a witness before they could process the crime scene and prepare a panchnama. I agreed to be a panch. I also guided Inspector Mattu to find the other panch Mr. Pabhu Sinha who lives in flat # 202.

When I entered the flat with Inspector Mattu, I noticed the table was set and food was on the table, but it appeared untouched. Mr. Ramesh Shetty was on the phone, and I could not see Mr. Avinash Shetty in the room anymore. I was lead directly into the far side bedroom on the right side of the hall. Inside that bedroom, on the bed, Mrs. Meena Shetty and Ms. Nishika were lying sleeping. The police said they were unconscious. The room was in a mess, with pillows and broken glass on the floor near the bed. Mr. Avinash Shetty was pacing up and down in the room and looking very hassled. His right lower arm was bandaged. I heard the Senior Inspector call for an ambulance to take the two women to hospital. The police took photographs of the two on the bed. The doctors and stretchers arrived at about 9.30 pm and the two persons were carried away.

The police then searched the room and took photographs of different objects in the room. The police examined the full area, The bedroom cupboards were all closed. They checked under the bed also, but there was nothing there. The police collected some used bloodstained tissue paper lying on the floor next to the bed.

They then proceeded into the bathroom. In the bathroom under the sink, there was a cabinet. The door of the cabinet was partially open. The police looked inside, and found two bottles, one of Baygon pesticide, and the other of Harpic toilet cleaner. The officer checked the two bottles in our presence and stated that both bottles still contained some liquid. The police photographed both items, placed them in transparent plastic self-locking bags and placed those bags in individual envelopes. Particulars of the item were written on each envelope, the envelope was closed and sealed and our signatures were obtained on the envelopes. I witnessed the police write the panchnama and collect the items, and They asked myself and the other pancha to sign as witness once they had completed recording of the panchnama. Mr. Pabhu Sinha read over the panchnama to me, explained its contents in simple Hindi and then we both signed the panchnama. The time was about 10.00 pm.

I was in shock, and when I returned to my desk at the main entrance to the building I called my supervisor and told him what had happened.

Mr. and Mrs. Shetty senior keep to themselves and never speak to me. Mr. Avinash Shetty and his daughter, Nishika, are always very polite and regularly greet me when they enter or exit the building. Nishika is not a normal child, but seems friendly. I have seen Mr. Avinash Shetty and Mrs. Meena Shetty arguing a lot recently. She seems very unfriendly and does not speak with anybody. She does not leave the house much, and she is always accompanying Nishika when she goes out.

3. PW3 – Mr. B. B. Bhulewagar

Sex: Male

Age: 34 yrs

Occupation: Asst. Chemical Analyzer

Statement: My educational qualifications are M.Sc in Analytical Chemistry from Gujarat University and I have been working as an Asst Chemical Analyzer for the past 12 years with the State Forensic Science Laboratory, located at Kalina, Mumbai. I am presently assigned to the Toxicology Division where I am responsible for examining body fluids and organ and tissue sections that come from post-mortems. I have completed about 600 cases in the last 5 years, some of which have pertained to chemical induced deaths.

On 17.June.2014 I received five properly sealed phials from Colaba Police Station. The envelopes were signed by Mukesh Palya, Prabhu Sinha, and API Mattu. These sealed phials were labelled as:

1. *CR# 1128/2014 Ex (D1) – Blood of Ms. Nishika Shetty (deceased)*
2. *CR# 1128/2014 Ex (D2) – Liver section of Ms. Nishika Shetty (deceased)*
3. *CR# 1128/2014 Ex (D3) – Saliva swab from cheek of Ms. Nishika Shetty (deceased)*
4. *CR# 1128/2014 Ex (A1) – Blood of Mrs. Meena Avinash Shetty (accused)*
5. *CR# 1128/2014 Ex (A2) – Stomach wash contents Mrs Meena Avinash Shetty (accused)*

The above samples were delivered by Constable Patil of Colaba Police Station under their forwarding letter. I checked the seals. All the seals were intact so I accepted the samples for analysis. Since the phials were delivered at 4.00 pm on 17.June.2014 and I knew I could not start the analysis that day, I completed the necessary custody log and placed them securely in the assigned secure refrigerator till the next day.

In addition I received two more sealed parcels labelled *CR#1128/2014 Ex (S1) – tin of Baygon*, and *CR# 1128.2014 Ex (S2) – bottle of Harpic toilet cleaner*. Both these parcels were properly sealed and signed by API Mattu, Mukesh Palya and Prabhu Sinha. I secured these items in the lab locker.

At 9.30 am on 19.June.2014 I retrieved all five phials from the refrigerator after completing the custody log. I also retrieved the sealed parcels labelled *CR#1128/2014 Ex (S1) – tin of Baygon* and *CR# 1128.2014 Ex (S2) – bottle of Harpic toilet cleaner*. All the seals were still intact. I completed the documentation for description of all the samples and then began the actual chemical analysis at 11.15 am.

I examined the blood and tissue samples, and proceeded to identify the chemical present in each sample, using Thin layer Chromatography (TLC) technique. I prepared the 3 TLC plates for each item of evidence CR#1128/2014 Ex. D1, D2, D3, A1 and A2, as well as the standard reference samples of pesticides and over the counter drugs.

I ran the 15 TLC plates using standard operating procedures and completed these procedures by 4.00 pm, and I then left the plates overnight to dry, so that I could spray them with a visualizing agent the next day and then record my results.

I also took extracts of *CR#1128/2014 Ex D1* (blood of Ms. Nishika Shetty) and *CR#1128/2014 Ex A1* (blood of Mrs. Meena Avinash Shetty) and processed the samples by Gas Liquid Chromatography Technique to identify the ingested chemical, if any.

Then I retrieved and opened the sealed parcel marked *CR#1128/2014 Ex (S1) – tin of Baygon*. I documented the nature of the tin. It was a 250 ml tin. It had a manufacturing date of January 2014, and an expiration date of March 2016. The batch # was 22469. I measured the entire contents of the tin, and it measured

116 ML. I then examined the chemical constituents of the Baygon liquid using the routine Gas Liquid Chromatography technique.

Next, I retrieved and opened the sealed parcel marked *CR#1128/2014 Ex (S2) – bottle of Harpic toilet cleaner*. The plastic bottle was yellow in colour and was marked 300 ML. It had a manufacturing date of May 2014, and an expiration date of April 2015. The batch # was HS786-5. I measured the entire contents of the bottle, and it measured 245 ML. I then examined the chemical constituents of the Harpic. I recorded my results for both analyses, resealed the parcels and secured them using the custody log.

On 20.June.2014 at 9.30 am when I returned to the lab, I retrieved the 15 TLC plates kept for drying on 19.June.2014. I then sprayed the plates with visualizing reagent and recorded my observations.

My observations showed that all the phials *CR#1128/2014 Exhibits (D1), (D2), and (D3)* showed the presence of the organophosphates group of pesticide compounds, similar to Baygon insecticide. Phials marked *CR#1128/2014 Ex (A1)* and *(A2)* contained the 'carbamates' group of pesticide compounds. There were no traces of Harpic toilet cleaner in any of the five biological samples tested.

These results were confirmed by the GLC analysis of the blood samples also done on 19.June.2014, which showed the presence of pesticides in both blood samples *CR#1128/2014 Ex D1* and *CR#1128/2014 Ex A1*. I forwarded the Report of Chemical Analysis to Colaba Police Station on 22.June.2014.

In my opinion, neither Ms. Nishika nor Mrs. Meena Shetty had consumed any of the Harpic liquid. Based on the TLC and GC results, it is possible that the Baygon

insecticide was ingested by both the deceased Ms. Nishika Shetty and the accused Mrs. Meena Avinash Shetty. However, since the deceased was a minor of age 8 yrs, the chemicals proved fatally toxic and caused the death of the child Ms. Nishika Shetty.

In the case of Ms. Meena Avinash Shetty, since her body weight and age were to her advantage and she received emergency treatment in time, most of the toxic effects of the chemical were eliminated and did not prove fatal.

4.PW4 – IO (Senior PI Ravi Maniyar), Colaba Police Station

Statement: On 16 June.2014, I received a call at 8.50 p.m. from the Police Control Room informing me that a lady named Mrs. Meena Avinash Shetty and her minor child Ms. Nishika Shetty residing at Cosy Castle building, 4th floor, flat # 401 (put complete address.), were found lying in their bedroom in an unconscious state and that they both appeared to have consumed some poison. I, along with API Mattu, reached the scene at about 9.00 pm to find a minor girl child and a woman lying unconscious on the bed in the northeast bedroom of the flat. Both were unconscious but the child was frothing at the mouth. They were identified by Mr. Avinash Ramesh Shetty, the husband of the lady, and the father of the child, as his wife Mrs Meena Shetty and his 4 year old daughter Ms. Nishika Shetty. I called the Colaba Police Station and asked them to send an ambulance for both the unconscious females to be transported to G.T. hospital. One of my female officers accompanied the woman and child in the ambulance. I then began questioning those present about what happened.

Mr. Avinash Shetty said that he was with his wife and daughter earlier in the afternoon, at about 4.00 pm. He said he then had to step out with his father, Mr. Ramesh Shetty, to go to the Radio Club where they were meeting somebody for

tea. When he left at 4.30 pm, he said his wife was in the bedroom with his daughter. He said his wife was not in a good state of mind at the time and said she wanted to lie down for a while. His mother, Mrs. Malti Shetty was at home, so he asked his mother to keep an eye on his wife.

When he returned home at 8.00 pm he sat to watch TV in the hall, and when dinner was ready at 8.30 pm, he went in to get his wife and child to the table. The bedroom door was still closed, since it was unlocked he just walked in and he found his wife and child lying on the bed. They looked like they were sleeping, so he called out to them, when they did not stir, he shook his wife to wake her but she did not respond. He then saw his daughter had some white liquid coming out of her mouth. He panicked and ran out to get his father and mother. Then all three went back into the room and tried to wake the child and mother. Realizing something was wrong, Mr. Ramesh Shetty then told his son to call the police control room .

I proceeded to conduct a search of the bedroom. The room was messed up and there were pillows and broken glass on the floor. There was a bloodstained tissue lying on the floor. Upon searching the bathroom, I found a half full bottle of Baygon liquid and one open plastic bottle of Harpic toilet cleaner under the sink, in a cabinet. I had these evidences photographed, packaged and sealed. I then cordoned off the area and asked one of my officers, API Mattu, to draw up a house panchnama in the presence of witnesses.

I asked Mr. Ramesh Shetty to confirm that he had gone to Radio Club with his son at 4.30 pm and he told me he had. He also informed me that his son and wife had been arguing earlier in the day because Nishika was thrown out of class that day because of her bad behaviour. He had heard lots of shouting in the bedroom after

lunch. He also heard his grand-daughter crying. He said that this happened frequently now, especially since Nishika had started in the new school for children with disabilities. He said his daughter-in-law seemed very moody of late and barely spoke to anybody in the house. She stayed in her room a lot.

I asked Mrs. Malti Shetty whether she too had heard the shouting in the bedroom but she said no, since she had been out for a lunch kitty party and only returned at 3.40 pm. She said while her husband and son were away she was on the phone with her sister for a while and then she was doing household chores in the kitchen and her own bedroom. She said she did not go into her daughter-in-law's room to check on her, nor did she hear any sounds from the bedroom. She said once she was done with her chores at about 7.30 pm she started watching a serial on TV in the hall. She was still watching when her son and husband returned home at 8.00 pm.

At about 9.50 pm, I was informed by my female subordinate that the child, Ms. Nishika Shetty had been declared dead on arrival, and that she was presently in the post mortem centre of GT Hospital. I reached GT Hospital post-mortem centre at about 10.05 p.m. and questioned the medical officer on duty, Dr. Pandey, who said at initial examination it appeared that Nishika Shetty was born with a genetic birth defect, (Mongoloidism), and she appeared to have ingested some sort of chemical as she showed signs of severe toxicity. Further post-mortem details would be provided after completion of the procedure and subsequent toxicological analysis of blood and tissue samples from her body.

I checked on the status of Mrs. Meena Shetty and was told she had regained consciousness after gastric lavage treatment for ingestion of pesticide. I went

across to speak to her in the female general ward at 10.20 pm in the presence of her treating physician but Mrs. Shetty said she did not have knowledge of how she and her daughter had consumed toxic chemicals, and she was unaware of her daughters' death. I placed her under arrest after the FIR was registered.

After conducting further investigations, receipt of toxicology and post-mortem reports and recording the statements of other witnesses, I filed a chargesheet against Mrs. Meena Avinash Shetty for offences under Section 302 and 309 of IPC.

EXHIBIT NO. 4

POST MORTEM REPORT

A. POST MORTEM FINDINGS FOR CASE NO: CR# 1128/2014

BODY IDENTIFIED BY: Father of deceased

DATE AND HOUR OF STARTING AUTOPSY: 17 June 2014, 10.45 am

DATE AND HOUR OF CONCLUDING AUTOPSY: 17 June 2014, 12.30 pm

1. NAME OF DECEASED: Ms. Nishika Avinash Shetty
2. D/O: Avinash Ramesh Shetty AGE: 4 yrs SEX: Female
3. ADDRESS: Flat # 401, 4th floor Cozy Castle building, 24 Shahid Bhagat Singh Marg, Colaba, Mumbai 400005

4. HEIGHT: 2 feet 8 inches WEIGHT: 19 kgs
PHYSIQUE: Weak, undernourished. Mongoloid features

5. SPECIAL IDENTIFICATION FEATURES: Mole on left cheek.

6. POST-MORTEM CHANGES PRESENT: Rigor mortis seen primarily in lower limbs and extremities, post-mortem lividity seen on left side of face, and left side.

7. EXTERNAL APPEARANCE: There is significant fresh bruising, and scratching seen on the wrists, upper arms and chest region. Old, healed ante-mortem scars seen on right arm. Pupils are dilated. White frothing at mouth. Upper limbs show partial rigour mortis.

8. INJURIES: All scratches and bruising are ante-mortem – some fresh, some healed.

INTERNAL: smell of kerosene from nose and mouth SPECIMEN

COLLECTED FOR TOXICOLOGICAL ANALYSIS

A. NATURE OF SPECIMEN PRESERVED

1. Sample of Blood – 5 ML collected Preservative Used: EDTA
2. Sections of liver – 2 gm Preservative used: Formalin

3. I.O. please arrange for Toxicological Analysis of the viscera from SFSL, which is duly preserved, sealed and handed over to Police along with Sample of seal.

B- ITEMS HANDED OVER TO POLICE

1. Post Mortem Report
2. Inquest Papers
3. Dead Body
4. Viscera, Clothes and articles, if any

C- TIME SINCE DEATH: Approx. 3 hrs.

D- OPINION: The cause of death to the best of my knowledge and belief is acute toxicity due to ingestion of liquid chemical, possibly pesticide, pending confirmation from toxicological analysis.

On 17 June 2014 at 3.00 pm

Sd/-

Dr. P. Pandey

Medical Officer

G.T. Hospital

Mumbai

EXHIBIT NO. 5

MEDICOLEGAL INJURY CERTIFICATE

EPR No: 202

Date: 16.June.2014

Time: 10.15pm

Brought by P.C. No WPC 445, Colaba Police station

C.M.O. on Duty: Dr Ashwini Lad

NAME: Meena Avinash Shetty

AGE: 31 years

SEX: Female

ON GENERAL PHYSICAL EXAMINATION (GPE):

Gait –patient unconscious

Speech – patient unconscious

Pupils – dilated and reactive

Pulse – 86 / minute

B.P. 100/60 mm Hg

IDENTIFICATION MARKS: nose piercing in left nostril

TYPE OF INJURIES: Fresh scratch marks on upper arms and bruising on left wrist seen

OPINION: In my opinion, patient is suffering from acute short - term toxicity due to ingestion of chemical toxin.

REMARKS: Patient admitted to Internal medicine ward for gastric lavage and subsequent observation.

SPECIMENS SUBMITTED FOR TOXICOLOGICAL ANALYSIS:

1. Sample of blood – 5 ML with preservative EDTA
2. Contents of gastric lavage – 10 ML (no preservative added)

Signed: Dr. Ashwini Lad

C.M.O. G.T. Hospital, Mumbai

EXHIBIT 6:

BIOLOGICAL EXAMINATION REPORT

ML case No: *B-4022/14*

Date: *19.June.2014*

Total no. of pages: *One*

To: The Senior Police Inspector
Colaba Police Station
Dist:- Mumbai

1. Ref No: *9165/14* Date: *17.June.2014*
2. No. of exhibits received: *One* P.S. : *Colaba*
3. C.R. No: *1128/2014* U/s: *IPC 302, 309*
4. Mode of Receipt: *by ASI Patil* Date of Receipt: *17.June.2014*

5. Condition of parcel(s) / seal(s): *One sealed phial seals intact as per copy sent*

6. Description of article(s) contained in the parcel(s):
Blood in phial labelled – CR#1128/2014 Ex D1 (blood of Ms. Nishika Shetty)

7. **Results of Analysis:**
Exhibit D1 is of Blood Group 'A' and is a control sample.
For Toxicological Analysis please refer FSL ML Case No: 4042/14

8. Analysis started on: *18.June.2014*
9. Analysis completed on: *18.June.2014*
10. Analysed by: Sd./ (M.V. Pathak)

Assistant Chemical Analyser in Government
Forensic Science Laboratories, Mumbai

EXHIBIT 7:

BIOLOGICAL EXAMINATION REPORT

FSL case No: *B-4022/14*

Date: *19.June.2014*

Total no. of pages: *One*

To: The Senior Police Inspector
Colaba Police Station
Dist:- Mumbai

1. Ref No: *9165/14* Date: *17.June.2014*
2. No. of exhibits received: *One* P.S. : *Colaba*
3. C.R. No: *1128/2014* U/s: *IPC 302, 309*
4. Mode of Receipt: *by ASI Patil* Date of Receipt: *17.June.2014*
5. Condition of parcel(s) / seal(s): *One sealed phial seals intact as per copy sent*
6. Description of article(s) contained in the parcel(s):
Blood in phial labelled – CR#1128/2014 Ex A1 (blood of Mrs. Meena Shetty)
7. **Results of Analysis:**
Exhibit A1 is of Blood Group 'O' and is a control sample.
For Toxicological Analysis please refer FSL ML Case No: 4051/14
8. Analysis started on: *18.June.2014*
9. Analysis completed on: *18.June.2014*
10. Analysed by: Sd./ (M.V. Pathak)

Assistant Chemical Analyser in Government
Forensic Science Laboratories, Mumbai

EXHIBIT 8:

BIOLOGICAL EXAMINATION REPORT

FSL case No: *B-4022/14*

Date: *19.June.2014*

Total no. of pages: *One*

To: The Senior Police Inspector
Colaba Police Station
Dist:- Mumbai

1. Ref No: *9165/14* Date: *17.June.2014*
2. No. of exhibits received: *One* P.S. : *Colaba*
3. C.R. No: *1128/2014* U/s: *IPC 302, 309*
4. Mode of Receipt: *by ASI Patil* Date of Receipt: *17.June.2014*

5. Condition of parcel(s) / seal(s): *One sealed phial seals intact as per copy sent*

6. Description of article(s) contained in the parcel(s):
One bloodstained tissue labelled – CR#1128/2014 Ex S3 (bloodstained tissue from crime scene)

7. **Results of Analysis:**
Exhibit S3 Blood Group analysis is Inconclusive.

8. Analysis started on: *18.June.2014*
9. Analysis completed on: *18.June.2014*
10. Analysed by: Sd./ (M.V. Pathak)

Assistant Chemical Analyser in Government
Forensic Science Laboratories, Mumbai

EXHIBIT NO. 9

TOXICOLOGICAL EXAMINATION REPORT

FSL case No: *TOX-4051/2014*

Date: 20.June.2014

Total no. of pages: One

To: The Medical Officer

GT Hospital

Mumbai 400001

1. Ref No: 40A/223/14
2. No. of exhibits received: One
3. C.R. No: 1128/2014
4. Mode of Receipt: by P.C. No 01003
5. Condition of parcel(s) / seal(s): One sealed phial seals intact as per copy sent
6. Description of article(s) contained in the parcel(s): Blood in a phial labelled CR#1128/2014 Ex D1 – blood of Ms. Nishika Shetty
7. **Results of Analysis:** Exhibit D1 is of blood and was found to contain 1.17 g/kg body weight of water soluble organophosphate pesticide
8. Analysis started on: 19.June.2014
9. Analysis completed on: 20.June.2014
10. Analysed by:

Sd./ (B.B. Bhulewager)

Assistant Chemical Analyser in Government

Forensic Science Laboratories, Mumbai

EXHIBIT NO. 10

TOXICOLOGICAL EXAMINATION REPORT

FSL case No: *TOX-4051/2014*

Date: *20.June.2014*

Total no. of pages: *One*

To: The Medical Officer

GT Hospital

Mumbai 400001

1. Ref No: *40A/223/14*

Date: *17June.2014*

2. No. of exhibits received: *One*

P.S. : *Colaba*

3. C.R. No: *1128/2014*

U/s: *IPC 302, 309*

4. Mode of Receipt: *by P.C. No 01003*

Date of Receipt: *17.June.2014*

5. Condition of parcel(s) / seal(s): *One sealed phial seals intact as per copy sent*

6. Description of article(s) contained in the parcel(s): *Phial containing Body tissue labelled CR#1128/2014 Ex D2 – liver section of Ms. Nishika Shetty*

7. **Results of Analysis:** *Exhibit D2 contains soluble organophosphate pesticide based on Thin Layer Chromatography analysis*

8. Analysis started on: *19.June.2014*

9. Analysis completed on: *20.June.2014*

10. Analysed by:

Sd./ (B.B. Bhulewager)

Assistant Chemical Analyser in Government

Forensic Science Laboratories, Mumbai

EXHIBIT NO. 11

TOXICOLOGICAL EXAMINATION REPORT

FSL case No: *TOX-4051/2014*

Date: *20.June.2014*

Total no. of pages: *One*

To: The Medical Officer

GT Hospital

Mumbai 400001

1. Ref No: *40A/223/14* Date: *17June.2014*
2. No. of exhibits received: *One* P.S. : *Colaba*
3. C.R. No: *1128/2014* U/s: *IPC 302, 309*
4. Mode of Receipt: *by P.C. No 01003* Date of Receipt: *17.June.2014*
5. Condition of parcel(s) / seal(s): *One sealed phial seals intact as per copy sent*
6. Description of article(s) contained in the parcel(s): *Cotton Swab of saliva labelled – CR#1128/2014 Ex D3 (swabbing of white saliva stain on left cheek of Ms. Nishika Shetty)*
7. **Results of Analysis:** *Exhibit D3 was found to contain water soluble organophosphate residues based on Thin layer Chromatography analysis*
8. Analysis started on: *19.June.2014*
9. Analysis completed on: *20.June.2014*
10. Analysed by: *Sd./ (B.B. Bhulewager)*

Assistant Chemical Analyser in Government

Forensic Science Laboratories, Mumbai

EXHIBIT NO. 12

TOXICOLOGICAL EXAMINATION REPORT

FSL case No: *TOX-4051/2014*

Date: *20.June.2014*

Total no. of pages: *One*

To: The Medical Officer

GT Hospital

Mumbai 400001

1. Ref No: *40A/226/14*

Date: *17June.2014*

2. No. of exhibits received: *One*

P.S. : *Colaba*

3. C.R. No: *1128/2014*

U/s: *IPC 302, 309*

4. Mode of Receipt: *by P.C. No 01003*

Date of Receipt: *17.June.2014*

5. Condition of parcel(s) / seal(s): *One sealed phial seals intact as per copy sent*

6. Description of article(s) contained in the parcel(s): *Blood in a phial labelled CR#1128/2014 Ex A1 – blood of Mrs. Meena Shetty*

7. **Results of Analysis:** *Exhibit A1 is of blood and was found to contain 0.66 g/kg body weight of carbamate insecticide*

8. Analysis started on: *19.June.2014*

9. Analysis completed on: *20.June.2014*

10. Analysed by:

Sd./ (B.B. Bhulewager)

Assistant Chemical Analyser in Government

Forensic Science Laboratories, Mumbai

EXHIBIT NO. 13

TOXICOLOGICAL EXAMINATION REPORT

FSL case No: *TOX-4051/2014*

Date: *20.June.2014*

Total no. of pages: *One*

To: The Medical Officer

GT Hospital

Mumbai 400001

1. Ref No: *40A/226/14*

Date: *17June.2014*

2. No. of exhibits received: *One*

P.S. : *Colaba*

3. C.R. No: *1128/2014*

U/s: *IPC 302, 309*

4. Mode of Receipt: *by P.C. No 01003*

Date of Receipt: *17.June.2014*

5. Condition of parcel(s) / seal(s): *One sealed phial seals intact as per copy sent*

6. Description of article(s) contained in the parcel(s): *Gastric lavage contents in a phial labelled CR#1128/2014 Ex A2 – 10 ML gastric lavage collections of Mrs. Meena Shetty*

7. **Results of Analysis:** *Exhibit A2 shows the presence of low quantities of carbamate insecticide*

8. Analysis started on: *19.June.2014*

9. Analysis completed on: *20.June.2014*

10. Analysed by: *Sd./ (B.B. Bhulewager)*

Assistant Chemical Analyser in Government

Forensic Science Laboratories, Mumbai

EXHIBIT NO. 14

CHEMICAL ANALYSIS EXAMINATION REPORT

FSL case No: *CA-3772/2014*

Date: 20.June.2014

Total no. of pages: One

To: The Senior Inspector

Colaba PS

Distt- Mumbai

1. Ref No: 9167/14
2. No. of exhibits received: One
3. C.R. No: 1128/2014
4. Mode of Receipt: by ASI Patil
5. Condition of parcel(s) / seal(s): One sealed tin seals intact as per copy sent
6. Description of article(s) contained in the parcel(s): Baygon tin labelled CR#1128/2014 Ex S1 – tin of Baygon from bathroom cabinet at crime scene
7. **Results of Analysis:** Exhibit S1 contains pyrethroid group of organic substances typically found in water soluble organophosphate pesticides, based on Gas Chromatography Analysis
8. Analysis started on: 19.June.2014
9. Analysis completed on: 20.June.2014
10. Analysed by: Sd./ (B.B. Bhulewager)

Date: 17June.2014

P.S. : Colaba

U/s: IPC 302, 309

Date of Receipt: 17.June.2014

Assistant Chemical Analyser in Government

Forensic Science Laboratories, Mumbai

EXHIBIT NO. 15

CHEMICAL ANALYSIS EXAMINATION REPORT

FSL Case No: CA-3772/2014

Date: 20.June.2014

Total no. of pages: *One*

To: The Senior Inspector
Colaba PS
Distt- Mumbai

1. Ref No: 9168/14 Date: *17June.2014*
2. No. of exhibits received: *One* P.S. : *Colaba*
3. C.R. No: *1128/2014* U/s: *IPC 302, 309*
4. Mode of Receipt: *by ASI Patil* Date of Receipt: *17.June.2014*

5. Condition of parcel(s) / seal(s): *One sealed bottle seals intact as per copy sent*
6. Description of article(s) contained in the parcel(s): *Harpic toilet cleaner labelled CR#1128/2014 Ex S2 – Harpic toilet cleaner from bathroom cabinet at crime scene*

7. **Results of Analysis:** *Exhibit S2 contains active ingredient corrosive hydrochloric acid, based on Gas Chromatography Analysis*

8. Analysis started on: *19.June.2014*
9. Analysis completed on: *20.June.2014*
10. Analysed by: *Sd./ (B.B. Bhulewager)*

*Assistant Chemical Analyser in Government
Forensic Science Laboratories, Mumbai*

APPENDIX- A1:

STATEMENTS OF DEFENCE WITNESSES

DW1 – Mrs. Shalini Phadke (Neighbour of Victim and Accused)

Sex: Female

Age: 33yrs

Occupation: Housewife

Address: Flat # 402, Cosy Castle building, 24 Shahid Bhagat Singh Marg, Colaba, Mumbai 5

Statement: I have lived at Cosy Castle flat # 402 since the past 10 years, ever since I got married. I live with my mother-in-law and husband. I am a housewife but since I do not yet have children of my own, and I used to be a nursery school teacher before marriage, I run afternoon story telling classes in our flat. For the last two years, a few children have been coming every afternoon from 3.30 – 4.30 pm and I read to them children stories and we do some fun art-n-craft activities.

I have known the Shettys, my neighbours, ever since I moved into Cosy Castle after marriage. The old couple are not very friendly, even my mother-in-law who is very cheerful and friendly has not had too much to do with the Shettys as they keep to themselves. After Avinash and Meena got married we used to meet Meena in the building and she was always very shy but polite. It was tragic when Nishika, whom we know and love very much was diagnosed with Mongloidism.

Meena was very scared of what her in-laws would say and how Avinash would treat Nishika. She was extremely protective of Nishika and was a caring, loving mother to the child. She was always running to doctors and therapists to help Nishika get all the help required. Very seldom did I see Avinash accompany them...it was usually only mother and daughter.

About a year ago, Meena heard about my classes and asked if she and Nishika could join in sometimes, but that she could not afford to pay me. I told her to just come and that I would welcome Nishika. We got to know each other much better then, and Meena, Nishika and I had great times together. Meena started confiding in me and telling me how difficult it was to live in the Shetty household. There was no live in domestic help, her mother-in-law was never home and her father-in-law was very harsh and difficult to please. She said her in-laws hardly ever spoke to Nishika, and treated her as if she was not there most of the time. She said Avinash was pleasant enough but very weak and of no real help. Sometimes it was almost as if he wished they were not there.

Last month, I was parking my car in the garage when I overheard Meena and Avinash arguing in the basement as they were returning from somewhere. I saw Avinash push Meena and drag Nishika roughly by the hand, because she started crying. They did not notice me as I was standing at my car, in my closed garage space. Later when I met Meena I asked her if Avinash is ever violent with her and she said 'yes, sometimes', and when she had tried calling her mother to ask her to help, her father-in-law overheard her on the phone and fired Avinash, after which even Avinash had started telling her how happy he was before his marriage and the birth of Nishika. He would often allude that Nishika had made their life very difficult. Of late Meena had become very depressed and had told me she feared for her life and Nishika's if something were to happen to her, because the family was very clear that she and Nishika were not welcome. After the phone incident with her mother, Meena said Avinash had stopped trying to mediate on her behalf.

Now, with this incident, I fear Meena's worst fears have come to pass, and Avinash and his family have tried to get rid of Meena and Nishika once and for

all. Having seen Meena interact with Nishika and her protective and caring attitude towards her daughter, I am of the strong opinion that Meena could not have taken her own daughter's life.

DW2- Mr. Arun Dasgupta

Sex: Male

Age: 68 yrs

Occupation: Forensic Expert

Statement: I am a retired forensic scientist, with 45 years of experience working in the Government Laboratories, primarily in the State Forensic Science Laboratory of Kolkata. I retired as Asst. Director Chemistry Division. I received my PhD in Forensic Toxicology from Punjab University in 1967. Over the years I have analyzed and interpreted over 8,000 toxicological cases involving poisonings, dowry deaths and drug and alcohol overdoses.

After retiring, I have become a consultant forensic expert and provide professional opinion to lawyers and individuals in the area of forensic toxicology.

I have gone through the papers of investigation handed over to me by Shivani Dasgupta, the sister of Mrs. Meena Shetty. I have scrutinized the chemical analyzers reports specifically related to the toxicological analysis of the post-mortem samples of Ms. Nishika Shetty and the samples from the accused Mrs. Meena Shetty. I have also read the report on the chemical composition of Baygon [CR#1128/2014 Ex(S1)] and Harpic [CR#1128/2014 Ex(S2)] provided by the SFSL Chemistry Division.

In my expert opinion, the organic compounds found in the blood, liver, and saliva of the victim Ms. Nishika Shetty, are different from the blood and stomach wash contents of the accused Mrs Meena Avinash Shetty. In my opinion, the chemical liquid ingested by the victim Ms. Nishika Shetty is NOT Baygon, but another group of pesticides like DDT , which is used in agricultural land. This pesticide if

ingested by humans in quantities in excess of 1 gm can prove fatal. The blood and gastric contents of the mother Mrs Meena Avinash Shetty (accused) shows the presence of carbamate compounds which are typically found in Baygon and have a short-lived toxicity.

DW3 – Mrs. Sarla Deshmukh (Mother of Accused)

Sex: Female

Age: 52 yrs

Occupation: Housewife

Address: Shanti Bhavan, 16 M G Road, Kolhapur 7

Statement: I am a widow, as my husband who was 12 years my senior, died of a heart attack two years ago. I have two daughters, Meena and Shivani. Both girls are married and settled. Both girls had arranged marriages. Meena, is the older daughter and lives in Mumbai. Shivani is younger by two years, and is married and lives here in Kolhapur.

I meet Shivani often as her in-laws are known to me and we are friends. I do not get to meet Meena much because she lives in Mumbai, and her in-laws do not like me to visit her. Once a year she comes to visit me in Kolhapur for a period of 3 weeks. The last time she came was one year ago for Holi. This year she was unable to come because of Nishika's new school.

Meena used to write to me regularly after her marriage. She was very strong through the shock of having Nishika born different. But we all supported her at home and love the little angel Nishika. Meena has always been very loving and extremely protective towards Nishika. Our only regret is that we get to see so little of them. Once a month I make it a point to call and have a very long chat with my daughter on the phone. It is nice to hear her voice and speak with Nishika.

Since February this year however, Meena has not been writing to me regularly like she used to. She also seemed to be a bit depressed and tired when I would talk to her on the phone. When I asked her, she always said she was managing, but was tired of her cold blooded in-laws, and their intolerance of Nishika. She said that Avinash who used to be supportive initially, had also now cooled off a lot, and always feared confrontation with his parents, so constantly wanted her to 'grin and bear it'. My last phone conversation with Meena was on 28.May.2014, when she was crying on the phone, she was complaining about Avinash shouting at her, and mistreating Nishika. She told me that Avinash had of late started telling her that life before marriage was extremely happy for him and that since the time of Nishika's birth he was under a lot of strain including financial strain which he was finding very difficult to cope with. She said she was unhappy and wanted to come home to me to visit. I think the extension line was picked up and somebody was listening to her phone call because suddenly she became quiet again and soon hung up the phone. I tried to call her back but her mobile was switched off and when I called the landline Avinash picked up and told me she was resting and did not want to be disturbed.

A few days ago, on 13.June.2014, I received a very disturbing letter by post from my daughter Meena dated 31.May.2014 in her own handwriting. Meena wrote that she was miserable and desperately wanted to come to Kolhapur with Nishika, and to please do something to help her. She said Avinash had hit her and Nishika that afternoon, when she asked to visit Kolhapur. They were having regular fights now. She said the in-laws were at home and heard everything but did not stop their son. Since then she said she has not been spoken to by her in-laws. She said that Avinash had started saying he wished he had never married her and had never had this baby because all they did was make him unhappy. She wrote that she was tired of fighting to live this life and the only reason she

did not give up was because of Nishika and that she was very worried about her child and her own safety in that house.

On 17.June.2014 at about 5 a.m. I received a phone-call from Mrs. Malti Shetty, Meena's daughter-in-law, simply telling me that something terrible had happened and I should come to Mumbai immediately. Despite asking several times, she did not tell me what had happened. My daughter Shivani and myself immediately came to Mumbai on 18.June.2014 and were shocked to learn that Nishika had passed away and my daughter Meena who had also consumed poison, had been arrested for Nishika's death and attempt to commit suicide.

I immediately rushed to Colaba Police Station and informed the police of Avinash's rude and abusive behavior towards my daughter and also handed this letter over to the police, but they did not take any heed and simply returned the letter back to me stating that my daughter alone was responsible for taking a child's life. I am therefore tendering this letter in Court today. (the Letter at Appendix A-2 may suitably be proved by the Advocate for the Defence).

I do not believe that my daughter, who's whole world revolves around Nishika and who was doing all she could for her child, would take Nishika's life. In fact, she kept telling me that she worried a lot about her child's future since her father (Avinash) considered Nishika to be a financial burden and rarely showed any affection towards the child and her in-laws just pretended that Nishika did not exist.

APPENDIX -A2 LETTER TO MRS. SARLA DESHMUKH

classmate
Date _____
Page _____

13th May, 2014

Dear Maa,

I am sorry for not writing for so long, but it is now getting very difficult for me to put pen to paper as I am being watched all the time by 'those Devils'. Maa... I am so tired of my life here that I just want to come permanently to Kolhapur with my beloved darling Nishi and stay with you forever and ever.

Today I got the courage to ask Avi if Nishi and I could come to you over this long weekend for a visit, but as usual he misunderstood and said I wanted to go only to complain about him, so even I told him why he gives me a chance to complain and he became so angry that he hit me hard on my right side head with his hairbrush. Both Nishi & I started crying and that made Avi more angry. Then he rushed to hit Nishi but I snatched the brush from his hand and got slapped instead. As usual he again told me that his life was much better before marriage.

and wished he did not have us in his life. My ear is paining very badly and my nose started bleeding but who can I tell?? Those DEVILS' were at home and heard everything but did not stop or do anything to stop their beloved son. Expected na?? Nishi will not improve at all with 'those DEVILS' in this house. Those DEVILS' are not talking to me and I don't care. I am sooo sorry to burden you Maa with all this but who do I tell except YOU? I am very lonely and frightened for my life here and the only reason I am not giving up is because of my sweetheart NISHI and cannot imagine her life with 'those DEVILS'... 😞

Maa, Avi has stopped recharging my mobile and so you call me on Tuesday 20th May please, as they are all going for Asha's son's thread ceremony and I am not going as they do not want my Nishi to come. Maa, please call me.... I badly want to speak to you. Give my regards to Shivani and Tiju and loads of love to you Maa.

Meenu 😞

APPENDIX A-3 TECHNICAL DATA SHEET

Note: This Data-sheet can be referred to by witnesses PW3 & DW 2 during their depositions in court.

PROPERTY	ORGANOPHOSPHATES PESTICIDES	CARBAMATES PESTICIDES
Examples	DDT, Endrin	Baygon, Sevin
Classification	Pesticide	Insecticide
Organic structure	Organophosphate group, (pyrethroid)	Carbamate group
Type of effect	Neurotransmitter inhibition (Choline esterase inhibition)	Neurotransmitter inhibition (Choline esterase inhibition)
Toxicity	Potentially fatal	Short lived (24 hrs)
Fatal dose	1-6 gm/kg body weight	Variable
Fatal period	30 mins – several hours	Variable
Characteristic Post-mortem appearance	White frothing; dilated pupils; kerosene like smell at mouth and nostrils	Dilated pupils; lowered respiration