

STATE OF MINNESOTA

DISTRICT COURT

COUNTY OF SCOTT

FIRST JUDICIAL DISTRICT

-----  
Bijoy Raghavan,

Petitioner,

vs.

File No. 70-FA-15-22094

**VOLUME I**

Smeeta Antony,

Respondent.  
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The above-entitled matter came before the Court, the Honorable Diane M. Hanson, in District Courtroom No. 4 of the Scott County Government Center, Shakopee, Minnesota, on October 18, 2016, and the following proceedings were had:  
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**TRANSCRIPT OF PROCEEDINGS**

**HAD UPON COURT TRIAL**

A P P E A R A N C E S

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1           THE COURT: This is a dissolution proceeding. And  
2 the Petitioner is Bijoy Raghavan. Please correct me if I'm  
3 mispronouncing your name or anybody's name. And Mr. Raghavan  
4 is here this morning along with attorney, Ms. Miller. The  
5 Respondent is Smeeta Antony. And Ms. Antony is here this  
6 morning representing herself.

7           This matter has been pending for just about a year or a  
8 a little over a year. There is an Order for Temporary Relief  
9 that has been in place for quite some time. The parties have  
10 undergone a custody evaluation regarding their two minor  
11 children.

12           We have not been able to resolve the matter, so we are  
13 scheduled for court trial today. I've just been advised that  
14 there may be a partial agreement here regarding the parties'  
15 homestead, and we will put that on the record at the  
16 appropriate time.

17           Before we get underway, I just want to cover a few  
18 things. This is a civil divorce proceeding, so the burden of  
19 proof is preponderance of the evidence. The Petitioner  
20 presents his case first, and then the Respondent has an  
21 opportunity to present her case. All witnesses must testify  
22 under oath and be subject to cross-examination. At the close  
23 of the trial, each party will have an opportunity to present  
24 a closing argument, and that can be done orally in the  
25 courtroom or it can be done in a written form, and we can

1 talk about that a little bit later.

2 Before we go any further, I just have a few questions  
3 for you, Ms. Antony. First of all, you're here today without  
4 an attorney and you are representing yourself; is that  
5 correct?

6 MS. ANTONY: That's correct.

7 THE COURT: Okay. Do you understand that, in this  
8 type of case, you have the right to be represented by an  
9 attorney, but if you want legal representation you must hire  
10 a private attorney? Do you understand that?

11 MS. ANTONY: Yes, I do.

12 THE COURT: Understanding that, is it your choice  
13 to proceed on your own today without an attorney?

14 MS. ANTONY: Yes.

15 THE COURT: Thank you.

16 And then I should note for the record that, in this  
17 particular proceeding, there are a number of unresolved  
18 issues. I noted that there may be an agreement regarding the  
19 parties' homestead, but there are other property issue that  
20 are not resolved. And I think it's fair to say those issues  
21 may include issues like spousal maintenance, and the dividing  
22 of other assets, and perhaps retirement accounts and personal  
23 property. The parties also have two minor children, and so  
24 there are a number of issues related to the children,  
25 including custody, parenting time and, I imagine, financial

1 issues like child support. It's the Court's understanding  
2 that those issues are not resolved, and so they are all  
3 scheduled for trial as part of this proceeding today.

4 I should also mention that, while it's not typical for  
5 parties to give an opening statement in this type of  
6 proceeding, I'm certainly willing to allow the parties to do  
7 that if they wish to.

8 Let me turn to you, Ms. Miller. Are you ready to  
9 proceed?

10 MS. MILLER: I am ready to proceed, Your Honor.

11 THE COURT: Do you wish to make any type of opening  
12 statement?

13 MS. MILLER: I would waive an opening statement,  
14 Your Honor.

15 THE COURT: Thank you.

16 And, Ms. Antony, do you wish to make any opening  
17 statement --

18 MS. ANTONY: Yes.

19 THE COURT: -- at this time?

20 MS. ANTONY: Yes, I do.

21 THE COURT: Okay. Go ahead.

22 MS. ANTONY: Your Honor, if I may, before I make  
23 the opening statement, I have a number of exhibits for the  
24 trial I exchanged with Ms. Miller yesterday that I have put  
25 on a flash drive, and are all numbered and in sequence.

1           Could I submit that to the Court as evidence?

2                   THE COURT: We can't receive a flash drive in this  
3 type of proceeding. Exhibits need to be in a form that can  
4 be marked here in the courtroom and offered to the Court in a  
5 form where the Court can actually see the exhibit.

6                   MS. ANTONY: So it needs to be a hard copy?

7                   THE COURT: It does. At this point, it does.

8                   MS. ANTONY: What about audio calls?

9                   THE COURT: Well, again, you can offer that type of  
10 evidence. Typically the way you would do that is you would  
11 offer a copy of the audio recording, itself, as the best  
12 evidence, and then you can play a recording in court or --  
13 and/or you can offer a transcript of the recording, as long  
14 as it is reasonably accurate, obviously, subject to objection  
15 by the other party.

16                   MS. ANTONY: Is that something that can be offered  
17 into evidence tomorrow, if it is a hard copy plus an audio  
18 recording?

19                   THE COURT: Well, a party can offer evidence during  
20 a trial subject to objection and ruling by the Court.

21                   MS. ANTONY: I haven't heard any objection.

22                   THE COURT: Well, that would happen at the time the  
23 evidence is offered, and that would happen during your case.

24                   And did you wish to make an opening statement?

25                   MS. ANTONY: Yes, I do.

1 THE COURT: Okay. Go ahead.

2 MS. ANTONY: My story begins in 2010, the day after  
3 a very innocent, benign surgery.

4 THE COURT: I'm going to stop you right there,  
5 ma'am, because the opening statement is really intended  
6 simply to alert the Court to the issues before the Court,  
7 your position on those issues, and the evidence you plan to  
8 present. It's typically a short road map of what is going to  
9 happen during the trial; it's not an argument and it's not  
10 testimony. So you can't -- if you wish to testify, you will  
11 have an opportunity to do that --

12 MS. ANTONY: Okay.

13 THE COURT: -- during the trial, but this is not  
14 the time to do that. So if you wish to make a brief  
15 statement explaining your position on the issues and what  
16 evidence you plan to offer, that's fine, but this is not the  
17 time to give a long, testimonial statement or an argument.

18 MS. ANTONY: Okay.

19 The allegation against me, the Respondent is a mentally  
20 ill mother who is experiencing hallucinations, has vivid  
21 outbursts, profane in nature, obsessive behavior with  
22 children's activities, irrational beliefs, false claims of  
23 domestic abuse, negatively affecting her children and all the  
24 people around her. She is incapable of taking care of the  
25 children at this point, as per the Petitioner. The children

1 have to plug their ears and shield them from the profanity  
2 and the hysterical laughter.

3 She quit her job unexpectedly in spite of holding  
4 leading positions in 2010 and was unable to return to work  
5 because of mental health issues.

6 She exhibits rash driving habits, endangering children's  
7 lives and neighbors lives. Numerous complaints were lodged  
8 from friends and neighbors.

9 Respondent is obsessive about the children's education,  
10 to the point where she imposes rigid timelines and is  
11 completely incentive to the children's needs as to where they  
12 might want to head in terms of their interests and ambitions.

13 She has a false sense of grandeur illusion in her head,  
14 such as not sticking with the local school district and  
15 forcing the children into Edina.

16 She is portrayed as dictatorial. Rigid behavior does  
17 not end with academics alone. She ensures and demands that  
18 the children participate in all activities regardless of  
19 wishes, their talents or their enjoyment of activity, fueled  
20 by the rigidity and irrationality of her mental illness. The  
21 children do not have a childhood, friends or what they need  
22 curtesy of the Respondent's behavior.

23 Respondent has developed irrational spending habits and  
24 demands that the Petitioner pay whatever she demands. She is  
25 very viscous in nature. And if the Petitioner does not

1 adhere to the demands, she is very abusive. Petitioner pays  
2 her whatever he can. He has kept invoices where the total of  
3 the invoices averages \$4200 a month. He has tried to be very  
4 reasonable and pays what he can for fear of how he might be  
5 treated by her.

6 Respondent is not taking medications and not seeking  
7 treatment. Unless she is ordered to go back on medication,  
8 nothing will change for the family. Respondent gets into  
9 rages where she's damaged electronic items in the house.  
10 Petitioner is in fear of his belongings and he refuses to  
11 bring them home.

12 Children need a life and, at this point, only the  
13 Petitioner can provide the children with a stable home. In  
14 the children's best interest, the Petitioner has requested  
15 sole custody of the children.

16 As part of her -- as part of her response to all of the  
17 allegations, the Respondent intends to education the Court  
18 about all the events that have transpired in her life that  
19 clearly show that she is a victim of organized crime. She  
20 would like to educate the Court on what paranoid  
21 schizophrenia is and what her paperwork eludes to.

22 She would like to educate the Court on articles  
23 published by the United States Department of Justice that  
24 show how easy it is to have devices turned against you, where  
25 you can feel that level of paranoia. She intends to educate

1 the Court on the fact that she has secured forensics on her  
2 hair sample that clearly show that she is exposed to  
3 radiation.

4 She intends to educate the Court that mind control or  
5 exposure to electromagnetic waves is very, very real, and  
6 that there have been cases in court today, an example such as  
7 Kathleen Watterson, which is a landmark win case in court  
8 today which actually proves that anybody can actually turn  
9 electromagnetic waves against and stimulates psychosis in  
10 you.

11 She intends to educate the Court on the fact that, for  
12 six and a half years now, she has been in the community  
13 without any episodes. 2010 to 2015, she spends about five  
14 hours in the community; she goes to classes; she goes grocery  
15 shopping; she's meeting with accountants; she's meeting with  
16 financial consultants; she's dropping her kids off to school;  
17 she's picking kids up from school; she's at volunteer  
18 activities. She is not exhibiting profanity; she's not  
19 hitting herself; she's not hysterically laughing; she's not  
20 doing any of that. But yet at home she is doing all of it.

21 As a paranoid schizophrenic who is overwhelmed by the  
22 fears that she is experiencing and the stimuli that she's  
23 experiencing that's causing her to respond to command  
24 hallucinations and that's causing her to respond to internal  
25 commands inside of her, she possibly could not be able to

1        assert that kind of control on the outside. And yet for five  
2        years straight, she has no episodes in the community. She's  
3        at museums; she's at schools; she's at beaches; she's at  
4        classes where there are other children around her. And if  
5        she's screaming profanity or if she's hitting herself or she  
6        is screaming profanely at her children, people will call it  
7        in, and yet there are no episodes whatsoever in the  
8        community.

9                2015 there are two public episodes that are logged  
10       followed by the ex parte divorce proceeding. And she'd like  
11       to educate the Court on the fact that, given the fact that  
12       she's exposed to radiation, given the fact there are pictures  
13       that show the burns of her skin, the swelling of her tissue,  
14       the dermal itching that she experiences, how could she not be  
15       a victim where anything could be stimulated in her and why is  
16       that paranoia?

17               She intends to education the Court on the fact that she  
18       is a victim who was stolen of everything, 70 grand of jewelry  
19       stolen, every cent taken over. In spite of growing savings  
20       to 40 grand, she's suddenly taken over financially in the  
21       entirety. She's lost everything, every piece of jewelry  
22       lost.

23               She's denied attorney representation. Nobody in her  
24       family seems to be surprised about the fact. She comes from  
25       a very influential family who's globe-trotted across the

1 world. Her father deals with contracts probably every single  
2 day across the World. He's not surprised by the fact that  
3 his daughter did not receive any kind of attorney  
4 representation. She calls that out. She's declared paranoid  
5 because she's supposed to accept the fact that she did not  
6 get any attorney representation.

7 She supposed to accept the fact if she didn't like  
8 certain behaviors in her family and she severed all ties with  
9 her family, that she is a paranoid schizophrenic. When she  
10 doesn't accept that, she's declared as not insightful into  
11 her illness. She intends to education the Court on the fact  
12 that excitability of tissue and psycho-stimulation, when  
13 you're exposed to radiation, is a very true and real concept.

14 In light of the fact she was denied an attorney  
15 representation, she was stolen of every single cent, she was  
16 taken over in every possible way, she has endured intense  
17 amounts of electronic harassment for which she has video  
18 proof, she has endured tailing and stalking from law  
19 enforcement for which she has video proof for which she can  
20 submit all of that on CDs individually, if needed, tomorrow  
21 in court.

22 She truly is a victim. You can't go through life for  
23 six and a half years, be exposed to radiation, be stolen of  
24 everything, be denied representation in every possible way,  
25 have numerous videos of law enforcement tailing her, have

1 numerous videos showing electronic harassment that she has  
2 endured, have proof of the fact that she is out of the  
3 community for about five hours every single day and that  
4 there are no episodes in the community to 2015 while she's so  
5 mad inside of the house, she's screaming, she's laughing,  
6 she's hitting herself, she's trashing objects, she's so ill  
7 inside of the house and she doesn't have anything on the  
8 outside of the house. That is just not feasible.

9 THE COURT: Thank you.

10 And, Ms. Miller, again are you ready to proceed?

11 MS. MILLER: I am, Your Honor.

12 THE COURT: Okay. You may call your first witness.

13 MS. MILLER: Your Honor, there were a few  
14 additional exhibit, that I didn't get marked. Would you like  
15 to mark them as they come up now?

16 THE COURT: That is fine.

17 MS. MILLER: Okay. Thank you.

18 I'm going to call -- I'm going to call Mr. Raghavan to  
19 the stand. I have been trying to learn to say his name the  
20 way he used to hear it when he was in India, Your Honor.  
21 He's just called my attention to that in the last few days.  
22 He has accepted Raghavan completely and fully, as well.

23 THE COURT: Thank you.

24 Sir, I'm going to have you step forward and take an  
25 oath, and then you may take the witness stand.

1 THE CLERK: Raise your right hand.

2 BIJOY RAGHAVAN,  
3 after having been first duly sworn, was examined and  
4 testified as follows:

5 THE WITNESS: I do.

6 I have notes.

7 THE COURT: Typically, witnesses don't testify from  
8 notes. If you need to look at notes to refresh your memory,  
9 your attorney can give you an opportunity to do that.

10 Would you please state your full name and spell your  
11 last name?

12 THE WITNESS: My full name is Bijoy Raghavan  
13 Punalur. And it's spelled as -- do you want the whole name?

14 THE COURT: Just the last name.

15 THE WITNESS: It's R-A-G-H-A-V-A-N.

16 THE COURT: Thank you.

17 And Ms. Miller.

18 DIRECT EXAMINATION

19 BY MS. MILLER:

20 Q And, Mr. Raghavan, in fact, there is another name associated  
21 with your name; is that correct?

22 A Yes.

23 Q And what is that name?

24 A Last name P-U-N-A-L-U-R.

25 Q How did Punalur get attached to your name?

1 A In India, usually the names are the first name of your name  
2 and the last name of your dad. So my dad's last name is  
3 Raghavan and -- but when you sign up for a school, they need  
4 a middle name, as well. So we said we don't have a middle  
5 name, we only have a first name and last name. So they said  
6 you have to have some name, so they just pulled the name of  
7 the village where my dad grew up and they put that against my  
8 name, and that village name is Punalur. So that is how we  
9 came to Bijoy Raghavan Punalur.

10 Q The reason we're pointing that out is that the name --

11 A That is the legal name.

12 Q That is the legal name --

13 A That is my legal name in the passports and Social Security,  
14 and every place.

15 Q And when we get your taxes, it will show up on taxes, as  
16 well.

17 A Yes, that's right.

18 Q So we are just clarifying that for the record.

19 Where do you live?

20 A Right now I live in Edina. The address is 7244 York Avenue  
21 South.

22 Q Is there an apartment number?

23 A Apartment number is 420.

24 Q And you are the Petitioner in this proceeding for dissolution  
25 of marriage; is that correct?

1 A Yes.

2 Q What is your wife's name?

3 A Smeeta Antony.

4 Q And where does Ms. Antony live?

5 A She lives at our current home, which is in Shakopee. And the  
6 address is 1495 Wakefield Circle.

7 Q How long have the two of you been separated?

8 A Since Thanksgiving of last year, so 11 months maybe.

9 Q How old are you?

10 A Forty-six.

11 Q And what is your birthday?

12 A July 20th, 1970.

13 Q How old is Ms. Antony?

14 A Forty-four.

15 Q When was she born?

16 A 27th March 1972.

17 Q How long have you lived in the State of Minnesota?

18 A Since '96, so 20 years almost.

19 Q And at the time that you commenced this dissolution  
20 proceeding, were you living in Scott County?

21 A Yes.

22 Q And you had been living in Scott County for how long?

23 A Bought the home in 2002, so 14 years.

24 Q When were you and Ms. Antony married?

25 A January 21st, '97.

1 Q And where were you married?

2 A In India, Bombay. Now it's called Mumbai.

3 Q And in filing the Petition for this dissolution of marriage,  
4 was it your statement that there has been an irretrievable  
5 breakdown of this marriage relationship?

6 A Yes.

7 Q And, to the best of your knowledge, is there any other  
8 proceeding for custody, or parenting time, or dissolution of  
9 marriage in any other court in the State of Minnesota?

10 A No.

11 Q Or anywhere else that you're aware of?

12 A No.

13 Q And is there any Order for Protection in effect concerning  
14 you and Ms Anthony?

15 A Yes -- I mean, I'm talking about the order of protection --  
16 oh, you mean against me, no. I was thinking about the child,  
17 the parenting time.

18 Q You were thinking of the order that basically --

19 A Yes, that's --

20 Q -- when you separated?

21 A Separated, yes.

22 Q But you understand what an Order for Protection is?

23 A Kind of.

24 Q That it's a separate proceeding?

25 A Okay.

1 Q Correct?

2 A Yes.

3 Q There is not an Order for Protection?

4 A No, no.

5 Q Has there ever been an Order for Protection?

6 A Not to my knowledge.

7 Q And you filed this Petition in good faith and for the  
8 purposes that you set forth in the Petition; is that correct?

9 A Yes.

10 Q Neither you nor Ms. Antony are in the military service of the  
11 United States?

12 A No, we are not.

13 Q And you are the parents of two daughters; is that correct?

14 A Yes.

15 Q When were they born?

16 A April 27th, 2006.

17 Q So they are twins?

18 A Twins, yes.

19 Q What are their names?

20 A The older one, if I can say that, is Renelle, R-A-N-E-L-L-E,  
21 middle name is A-N-T-O-N-E-T-T-E, last name is Raghavan,  
22 R-A-G-H-A-V-A-N. And the other one is Raeanna,  
23 R-A-E-A-N-N-A, middle name is Nina, N-I-N-A, and last name is  
24 my last name, R-A-G-H-A-V-A-N.

25 Q How much older is Renelle than Raeanna?

1 A I think 45 minutes.

2 Q So they're ten years old at this time?

3 A Yes.

4 Q And these children have been following a schedule of  
5 parenting time from the order that I think you were thinking  
6 of?

7 A Yes, that's right.

8 Q Since December of 2015?

9 A Yes.

10 Q What is that schedule?

11 A They visit their mom every other weekend, from Friday, 5:00  
12 p.m. to Sunday, 5:00 p.m.

13 Q To the best of your knowledge, is Ms. Antony pregnant at this  
14 time?

15 A I don't think so.

16 Q What type of work do you do?

17 A I'm a software consultant.

18 Q And you're basically self employed in this position as a  
19 consultant?

20 A That's right.

21 Q And can you explain how the circumstances -- how do you do  
22 your job?

23 A Basically, I own a company. The name of the company is IT  
24 Venture.

25 THE COURT: I'm sorry, can I get you to say that

1           again?

2                       THE WITNESS: I own my own company. The name of  
3 the company is IT Venture, Incorporated.

4                       THE COURT: Thank you.

5                       THE WITNESS: The way it works is I am actually  
6 working for a client, which is Gage Marketing, Incorporated,  
7 which is operated in Plymouth. I'm on contract to Gage  
8 through another company.

9 BY MS. MILLER:

10 Q       So that means, when we are looking at your income, that you  
11 have a business tax filing and a personal tax filing?

12 A       That's correct.

13                       MS. MILLER: Could I approach the witness, Your  
14 Honor?

15                       THE COURT: You may.

16 BY MS. MILLER:

17 Q       I'm going to show you an exhibit that has been marked number  
18 one. Do you recognize that?

19 A       Yes.

20 Q       What is it?

21 A       This is my corporate taxes.

22 Q       For what year?

23 A       For 2015.

24 Q       And I'm also going to show you exhibit -- a document that has  
25 been marked Exhibit 2. Do you recognize that document?

1 A Yes. That is my 2015 personal income tax.

2 MS. MILLER: Your Honor, as evidence of Mr.  
3 Raghavan's income, I would submit these two exhibits, 1 and  
4 2.

5 THE COURT: Thank you.

6 Ms. Antony, do you have any legal objection to those  
7 exhibits?

8 MS. ANTONY: No.

9 THE COURT: Then exhibits one and two are received.

10 BY MS. MILLER:

11 Q Is Ms. Antony employed at this time?

12 A Not to my knowledge.

13 Q Has she been employed in the past?

14 A Yes, she has. She has been employed until 2010, and she has  
15 held very good positions. She has -- we both started off at  
16 the same company as programmers, and she became a programmer  
17 analyst and a project manager. When she quit her job, she  
18 was a technical architect. And she was a technical architect  
19 then when she quit the job.

20 Q What education does Ms. Antony have?

21 A I think she has a Bachelor's of Computer Science from India  
22 and then did a Masters of Computer Science, I think, from the  
23 University of St. Thomas.

24 Q Okay. Do you have any information about the type of salary  
25 Ms. Antony earned when she was working?

1 A Yeah, she was compensated extremely well in the times when  
2 she was working as a contractor, and she was employed, as  
3 well, during the 15 or 16 years she worked.

4 Q How would you define she was compensated well? Is there a  
5 number you could attach to that?

6 A She was making more than me, and I would say at least 20  
7 percent more than what I was making.

8 Q So we are talking in excess of \$120,000?

9 A I'm talking when she was a contractor it was close to  
10 \$200,000, close.

11 THE COURT: I'm sorry, I didn't hear the number.

12 THE WITNESS: \$200,000 when she was a contractor.  
13 When an employee, the salary reduces, but there are benefits  
14 that go with it. I think the last salary as employed was a  
15 \$130 or \$140,000. I'm not sure the exact amount, but close  
16 to that range.

17 BY MS. MILLER:

18 Q You don't -- you don't receive any public assistance of any  
19 kind; is that correct?

20 A No, I don't.

21 Q And you and Ms. Antony own the home where Ms. Antony is  
22 currently residing?

23 A Yes.

24 Q I think you mentioned you purchased that in 2002?

25 A Yes, 2002.

1 Q And there are household furnishings and personal property in  
2 that home?

3 A Yes, that's right.

4 Q And you and the children moved to an apartment in  
5 approximately January of 2016?

6 A February.

7 Q February.

8 A February of 2016.

9 Q February 1st?

10 A First of February, yeah.

11 Q All right. And, at that time, did the children take their  
12 belongings from the home with them?

13 A They were not allowed to.

14 Q Did you receive any furnishings, household goods, from the  
15 home at the time you left?

16 A Except a few winter clothes at the time, other than that, we  
17 were not allowed to take anything from the home.

18 Q Did you ask?

19 A Yes, I did ask for some basic stuff, like couches and a  
20 couple of bedroom sets and some of their clothes and some  
21 pots and pans, but everything was denied.

22 Q So how many bedrooms are there in the home?

23 A Four.

24 Q How many bedroom sets are there?

25 A Four, four bedroom sets.

1 Q And furnishings?

2 A Yes, it's fully furnished. We have a home -- it's a  
3 four-bedroom home, but we have about -- about ten rooms in  
4 the whole house.

5 Q What did you do then?

6 A I had to go and buy furnishings on loan for my apartment.

7 MS. MILLER: If I could approach, Your Honor?

8 THE COURT: You may.

9 BY MS. MILLER:

10 Q I'm showing you a document that has been marked Exhibit 3.  
11 Do you recognize that?

12 A Yes.

13 Q What is it?

14 A That's the expense that I had to incur for the furnishings,  
15 household goods and other items for the house -- for the  
16 apartment, rather.

17 Q For the apartment. And this is a copy of the receipts?

18 A Yes.

19 Q And some of this you put, basically, on credit --

20 A Credit, yes.

21 Q -- correct?

22 A Some of it I had to pay.

23 Q So the total amount that you had to spend was in excess of  
24 \$8,000; is that correct?

25 A That's right.

1 Q How much do you still owe for the furnishings that you had to  
2 purchase?

3 A I think about 4,000 or so.

4 MS. MILLER: Your Honor, I offer Exhibit 3.

5 THE COURT: Ms. Antony, do you have any legal  
6 objection to Exhibit 3?

7 MS. ANTONY: No, I don't.

8 THE COURT: Thank you. Exhibit 3 is received.

9 BY MS. MILLER:

10 Q You and Ms. Antony own two vehicles; is that correct?

11 A That's right.

12 Q And you are currently driving -- tell me which?

13 A 2015 Mazda CX9.

14 Q Okay.

15 A And Smeeta is driving a 2014 Toyota RAV4.

16 THE COURT: I'm sorry?

17 THE WITNESS: 2014 Toyota RAV4.

18 THE COURT: Thank you.

19 MS. MILLER: If I could approach, Your Honor?

20 THE COURT: You may.

21 BY MS. MILLER:

22 Q Bijoy, I'm going to show you a document marked Exhibit 4;  
23 there are two pages to that exhibit. Do you recognize that?

24 A Yeah, the Blue Book value of both the cars.

25 Q Both the vehicles?

1 A Yes.

2 Q And I'm going to show you a document that is identified as  
3 number five. Do you recognize that document?

4 A Yeah, that is the loan on the Mazda and the loan on the  
5 Toyota.

6 Q The loan balance on each of these vehicles?

7 A Yes, that's right.

8 MS. MILLER: Your Honor, I'd offer these, Exhibits  
9 4 and 5.

10 THE COURT: And, Ms. Antony, do you have any legal  
11 objection to these exhibits? Is that a no?

12 MS. ANTONY: No, I don't.

13 THE COURT: Then Exhibits 4 and 5 will be received.  
14 You can just leave them there, thank you.

15 MS. MILLER: This is where I skipped a page, so I'm  
16 going to -- if it please the Court, should I have these  
17 marked then?

18 THE COURT: You may.

19 BY MS. MILLER:

20 Q Mr. Raghavan, you have two checking accounts; is that  
21 correct?

22 A Yes.

23 Q I'm slowing you two exhibits that have been marked. Let's  
24 focus first on 13, Exhibit Number 13. Do you recognize that?

25 A That is my corporate checking account.

1 Q Okay. How many months of checking account?

2 A I think this is three months.

3 Q You think it's three months?

4 A From September -- I think it's June to July, July to August,  
5 August to September of 2016.

6 Q Is that your corporate account?

7 A Yes.

8 Q Because I'm going to suggest that it's number 2645?

9 A That's right.

10 Q That is your home account.

11 A I'm confused here. But --

12 Q I'm sorry, 9891 is your corporate account?

13 A Yeah, that is right. So that is my individual account.

14 Q So Exhibit Number 13 is your personal --

15 A Yes.

16 Q -- checking account?

17 A Uh-huh.

18 Q Exhibit Number 14 is your corporate --

19 A Correct.

20 Q -- checking account?

21 A That's right.

22 Q And you're submitting these for purposes of demonstrating  
23 that the monies that first go into the corporate account are  
24 transferred into your personal account?

25 A That's right.

1 Q And that is the source of your resources?

2 A That's right.

3 Q For paying for your expenses?

4 A That's right.

5 Q Okay.

6 MS. MILLER: I'd offer Exhibits 13 and 14, Your  
7 Honor.

8 THE COURT: Thank you.

9 And, Ms. Antony, do you have any legal objection --

10 MS. ANTONY: No, I do not.

11 THE COURT: -- to those exhibits?

12 Thank you, 13 and 14 are received.

13 BY MS. MILLER:

14 Q Mr. Bijoy (sic), do you maintain health insurance for your  
15 family?

16 A Yes, I do.

17 MS. MILLER: If I could have this exhibit marked?

18 BY MS. MILLER:

19 Q I'm going to show you an exhibit that's been marked 15 for  
20 identification. Do you recognize that?

21 A Yeah, this is my medical insurance premium per month.

22 Q How much is it?

23 A It's 1305.01.

24 THE COURT: I'm sorry?

25 THE WITNESS: \$1,305.01.

1 THE COURT: I'm sorry, can you say that again?

2 THE WITNESS: 1305 --

3 MS. MILLER: I can give you a visual  
4 representation, Your Honor.

5 THE COURT: Okay.

6 MS. MILLER: \$1,305.01.

7 THE COURT: Is that a monthly premium?

8 THE WITNESS: That is a monthly premium.

9 MS. MILLER: I would offer this exhibit, Your  
10 Honor.

11 THE COURT: Do you have a legal objection to this  
12 exhibit, Ms. Antony?

13 MS. ANTONY: No, none.

14 THE COURT: Exhibit 15 is received.

15 The Court would inquire, what does this insurance cover  
16 and for whom?

17 MS. MILLER: Okay. Thank you, Your Honor.

18 BY MS. MILLER:

19 Q What does this insurance cover?

20 A This is the medical insurance for me, Smeeta and Raenna and  
21 Renelle.

22 Q Is there a deductible?

23 A To my knowledge, I think it is 3,000 individual and 5,000  
24 family in network.

25 Q In network?

1 A Yeah, I'm not sure about the out of network.

2 THE COURT: Do we have any way of knowing what  
3 share of that applies to the children?

4 THE WITNESS: I think \$400 for each of us, and the  
5 remaining is 500 -- so about 250. Approximately. I don't  
6 know the exact amount, but this is from my recollection.

7 BY MS. MILLER:

8 Q You're recalling that your premium would be approximately  
9 \$400?

10 A And then hers would be 400, and remaining is divided equally  
11 between the kids. So 1300 minus 800 is five, divided by two.

12 Q So it would be 500 for both the children; is that right?

13 A Yes. But this is the premium of 2015. I'm not sure about  
14 2016 because they are not.

15 Q Correct.

16 THE COURT: Just leave those there.

17 MS. MILLER: Is this accepted with the  
18 clarification?

19 THE COURT: I already received it.

20 MS. MILLER: Okay. Thanks.

21 BY MS. MILLER:

22 Q Mr. Raghavan, you also maintain dental insurance; is that  
23 correct?

24 A Yes.

25 Q And the dental insurance comes out of your personal checking

1 account each month?

2 A That's right.

3 Q Is that correct?

4 A That's right.

5 Q So in the statement that you presented for the Court, there  
6 will be a deduction from your account from Health Partners;  
7 is that right?

8 A That's right.

9 Q And the amount of that deduction is?

10 A I think it's \$150 and some cents.

11 Q How about four cents?

12 A That sounds right.

13 Q And who is covered on this dental coverage?

14 A Me and Smeeta.

15 Q Not the children?

16 A The children I think are covered under the medical because  
17 that is part of the Obama Care, the kids get covered for  
18 dental coverage.

19 Q So as far as you know --

20 A As far as I know.

21 Q -- their coverage is medical and dental from Medica, and your  
22 coverage --

23 A Me and Smeeta, yeah, are covered under that.

24 Q This is for two of you?

25 A Two of us, yes.

1 THE COURT: Could I clarify, was it 150 or 115?

2 MS. MILLER: Fifty, five-zero.

3 THE COURT: Thank you.

4 BY MS. MILLER:

5 Q Mr. Raghavan, you maintain a retirement program?

6 A Yes.

7 Q With Schwab; is that correct?

8 A That's right.

9 Q I'm showing you an exhibit that has been marked 16. Do you  
10 recognize that?

11 A This is my SEP account and individual 401K account.

12 Q And those are combined in that statement?

13 A Yes, that's correct.

14 Q Do you have any other retirement interests other than those  
15 that are accounted for in that statement?

16 A No, I don't.

17 MS. MILLER: Your Honor, I would offer Exhibit  
18 Number 16 as evidence of Mr. Raghavan's retirement interests.

19 THE COURT: And, Ms. Antony, any legal objection to  
20 this exhibit?

21 MS. ANTONY: No.

22 THE COURT: Exhibit 16 is received.

23 If the Court could inquire, Ms. Miller, do you have any  
24 valuation on the account, as far as marital property?

25 BY MS. MILLER:

1 Q This was all obtained while you were married correct, Mr.  
2 Raghavan?

3 A And it's ongoing even -- yeah, I am still married, yes.

4 Q I guess -- the date of this document is October 3rd of 2016,  
5 correct?

6 A That's right.

7 Q Does Ms. Antony also have retirement funds?

8 A Yes.

9 Q Has she given us a statement of those funds for purposes of  
10 this proceeding?

11 A To my knowledge, she has not.

12 Q You and Ms. Antony started a college fund, a 529 Plan, for  
13 both of the children; is that correct?

14 A That's correct.

15 Q I'm going to show you two exhibits that have been marked for  
16 identification as Numbers 17 and 18. Do you recognize what  
17 those are?

18 A Yes, this is a 529 savings plan for Renelle. And the number  
19 17 is the 529 college savings plan for Raeanna.

20 Q Do we know what date -- were these October 3rd, as well?

21 A This, yes, October I would say. It's September -- last  
22 transaction was September, so I would say end of September.

23 Q Okay. The end of September is the balance?

24 A Yes.

25 Q I see there is an entry on September 30th.

1 A That's right.

2 Q Mr. Raghavan, what would you like to have happen to these 529  
3 accounts that the girls -- that you started for the girls?

4 A I would like to just maintain that account until they go to  
5 college and we use the funds for their college.

6 Q You're asking that this not be part of the division, that  
7 both you and Ms. Antony are named on this account and that it  
8 would remain for the children's use?

9 A Yes.

10 Q According to the rules of the 529 plan?

11 A That's right.

12 MS. MILLER: Your Honor, I offer Exhibit 17 and 18.

13 THE COURT: Ms. Antony, do you have any legal  
14 objection to these exhibits?

15 MS. ANTONY: No.

16 THE COURT: Then 17 and 18 are received.

17 BY MS. MILLER:

18 Q Mr. Raghavan, you and I have discussed what it is -- the  
19 topics that are here before the Court today; is that correct?

20 A Yes.

21 Q And have you -- and they include what? What is your  
22 understanding of what we are going to ask the judge to make  
23 decisions about?

24 A It's the dissolution of the marriage and division of the  
25 properties, retirement, custody evaluation. I think that is

1 about it.

2 Q Potentially maintenance?

3 A Potentially, yeah, maintenance.

4 Q And have you and Ms. Antony had any discussions about  
5 resolving any of these issues?

6 A We have tried to talk to Smeeta every time we get here in the  
7 court. Other than that, I never had a one-on-one  
8 conversation with her regarding any solution.

9 Q Do you think it's possible for you and Ms. Antony to make any  
10 agreements concerning the issues that are outstanding in this  
11 case?

12 A I don't think so.

13 Q Now, you would like to offer testimony concerning the facts  
14 in this case as it relates to the unresolved issues then; is  
15 that correct?

16 A Yes.

17 Q Let's start with the children?

18 A Okay.

19 Q What has been the history of the children -- well, let's  
20 start with before they were born. That was a pretty  
21 significant undertaking for the family, was it not?

22 A Yes. So we were not able to have a natural conceiving  
23 process. So Smeeta had to go in vitro fertilization for  
24 that. And the first time did not succeed. And the second  
25 time succeeded and we had wonderful girls, and they were born

1 in April of 2006.

2 And Smeeta has been like -- when they were born, she has  
3 been very, very loving, caring mother. She took care of most  
4 of the kids stuff when they were born, their food and their  
5 -- I mean, basically, everything. And I helped a lot with  
6 feeding, staying up in the nights, doing everything that the  
7 dad is supposed to do.

8 And then they got -- when they were four, I think, they  
9 went to Pre-K in the SACS, Shakopee Area Catholic School,  
10 there was a Pre-K in SACS. And I think they were four at  
11 that time. And when they turned five -- I think they did the  
12 Pre-K and kindergarten in SACS, and then we started looking  
13 for schools.

14 And then Smeeta decided to enroll them into -- open  
15 enroll then, and I was told by her that the kids have got  
16 admission in Eden Prairie and Edina, and she chose Edina.  
17 And we never had a single discussion regarding the school  
18 district. I actually asked her about the logistics of  
19 dropping the kids and picking up the kids, and everything  
20 else, and she said, "You don't worry about it. You don't  
21 have to bother about that," and I just let it go because, in  
22 my mind, I knew that it was a good school district apart from  
23 the logistics, there is no bus from Shakopee to go to the  
24 Edina school. So I let that go.

25 And then she started -- I think it was back in 2010 when

1 the kids were four years old, that is when she started  
2 exhibiting paranoid behavior.

3 In fact, it was before that. When she worked for the  
4 company called Syngenta (phonetic) I still remember that she  
5 used to take some medication online, and that was like for  
6 some brain fog and brain stimuli. And I would always tell  
7 her, "If you have an issue with anything, why don't you just  
8 go to the doctor and talk to them about it?" But she would  
9 say, "No, I have done enough research. There is no side  
10 effects to this medication." And there was quite a few of  
11 them. I don't know, powder and some small tablets.

12 And then Smeeta is a person, as far as I know -- I have  
13 known her half of my life, actually. She would not even take  
14 a cough drop if she's coughing. And a person who won't take  
15 any medication suddenly started taking all this medication  
16 was really a puzzle to me. I tried to talk, but she did not  
17 agree, and I just let that go.

18 Then in 2010, her sister was diagnosed with breast  
19 cancer, and her family was going through a rough time. She  
20 used to be talking to her sister for hours on the phone, and  
21 her sister actually had just bought a house in Dubai. And  
22 so, at the same time, Smeeta was diagnosed with a lump in her  
23 breast, and we had a surgery and it was not cancer. So I  
24 don't know what the term is.

25 Q Benign?

1 A Benign, yeah, but we kept it away from her family because we  
2 didn't want them to be concerned about her because the other  
3 daughter is already going through breast cancer.

4 So just before the surgery, she had actually quit her  
5 job. And I still remember getting -- a year or so that she  
6 was at Syngenta, she was always coming home with work and she  
7 was always stressed out, and she would be up early in the  
8 morning, sleep very late because of the work pressure, I  
9 assumed. And she would always say the people there were not  
10 very cooperative and they are -- apparently they BSG, in  
11 their own light. They are extremely educated, and they are  
12 not very cooperative with a person -- an outsider like Smeeta  
13 because she went in as a technical architect with the  
14 company. So they would not want to explain the process to  
15 her and wanted her to learn all the processes and implement  
16 the technology.

17 Q Did this concern seem out of proportion to what her work  
18 setting actually was?

19 A It seemed to me that she was over exerting on the stuff --  
20 according to Smeeta, her role, she doesn't have to do this.  
21 She was to install software at home and try to implement that  
22 process. I would tell her, "Your role, you're a technical  
23 architect." As far as I know, a technical architect does not  
24 implement software. They just say this software is  
25 available, and you use it.

1 THE COURT: I have to ask you to slow down. I'm  
2 having trouble understanding you, and I know my reporter is  
3 having trouble recording your statements. If you could just  
4 take it a little slower.

5 BY MS. MILLER:

6 Q Bijoy, perhaps if you let me ask a question, because I know  
7 there is a lot in your mind that you think about. Let's try  
8 that because that will naturally slow you down.

9 A Okay.

10 Q I'm going to ask, was Smeeta's condition, her attitude or her  
11 behavior, did that improve after she quit working?

12 A No, it did not.

13 Q So she began, if I'm understanding you correctly, taking the  
14 children to school because she wasn't working?

15 A Uh-huh.

16 Q Is that right?

17 A That's right.

18 Q Can you fix in your mind, what was the next thing, in terms  
19 of the chronology, since 2010, what was the next thing that  
20 sticks out in your mind as concerning to you about your  
21 children and Smeeta's conduct?

22 A Summer of 2010, when she quit her job and she had the  
23 surgery, she already got another job with the same company  
24 that I'm working currently, which is Gage Marketing, as a  
25 contractor. So just before joining Gage, I observed some

1 paranoid behavior in her, and she would just -- she is a  
2 person who always let me -- she never interfered in my work,  
3 now matter what, whether I'm watching TV or whether I'm  
4 browsing a website, she would never come and interfere. But  
5 when she started having this paranoid behavior, she started  
6 doubting me on everything, like any website I go, she would  
7 tell me, "What website are you watching?" I would say, "This  
8 is the website I've been on." But she would say, "No, this  
9 is not the website you were watching right now." So that  
10 continued for awhile.

11 Then she started to have some other paranoid behavior,  
12 like the -- somebody is watching her from the windows. So  
13 come -- I'm talking like the month of September or October of  
14 2010, and it used to be dark outside after 7:00 o'clock. And  
15 she used to make me switch off the lights in the room so that  
16 nobody can watch her inside.

17 She has called the cops a couple of times, just saying  
18 the house is bugged and the phones are bugged. The cops have  
19 come to the house, inspected the phone and walked around in  
20 the house and said there is no problem in the house.

21 Then she started telling me that the microwave is doing  
22 something to me. So she had me shut down the microwave for  
23 three days, microwave oven, for three days in the house. So  
24 we couldn't use it. Then she would go to try to turn on the  
25 microwave and say, "Why is this not working?" I would tell

1 her, "You told me to shut it down."

2 At that point, I was in denial because I didn't  
3 understand what was going on. I was trying to figure out  
4 what is going on, but I did not know actually what was going  
5 on.

6 Q You are using the word paranoid behavior, but, at the time,  
7 you didn't have those words?

8 A No, I didn't know. That is after all these years of research  
9 and talking to people and talking to doctors, is how I  
10 understand these behaviors.

11 Q So you were confused?

12 A Confused.

13 Q You were puzzled?

14 A Yes.

15 Q And you tried to do what you could to help her understand,  
16 no, there is nobody outside?

17 A Yes.

18 Q No, the microwave is not influencing things that microwaves  
19 shouldn't influence?

20 A It's not only the microwave. If we go to a mall and she sees  
21 anybody talking on the phone, she would think that they are  
22 talking about her and she would go and stand right next to  
23 that person and start laughing. Then I would say, "You're in  
24 a mall. You have to -- there are a lot of people and kids,  
25 and everything," but she would not listen to anything. So --

1 Q When was the first time that she appeared to laugh at -- in a  
2 situation that there was nothing to laugh about?

3 A That has been -- always been. She started back in 2010.

4 Laughter was always there. That never changed. That was  
5 always the first thing that I saw in that.

6 Q What did the children see?

7 A The children were -- back in 2010, they were just four years  
8 old. So they didn't understand much about it.

9 In the same year, she wanted to sell the house and go  
10 and settle in Dubai. I told her, "Let's do that. Let's go  
11 to Dubai and find out what is a job, how is the school, and  
12 what kind of salary you get. Can we afford a private school  
13 for the kids?" Because, Dubai, the public schools are not  
14 good, is what I heard. Given the fact that United States has  
15 one of the best education systems in the world, I was very,  
16 very pessimistic of going to a different country and starting  
17 over. I somehow convinced her, "Let's go to Dubai and see  
18 the place and figure out what we need to do."

19 We go to Dubai. And our plan was to go to Dubai and  
20 then, after Dubai, we go to India and meet her folks -- my  
21 folks, because her folks were in Dubai. So we go to Dubai  
22 and she was obviously not talking to me.

23 I just wanted to lay this out there that she has been  
24 sleeping in a different room since, I think, beginning of  
25 2010. So we hardly have any have communication.

1           So we go to Dubai and her parents see us like two  
2 different people. They don't see us as a family. And they  
3 ask us, "What is the problem?" So I said, "Nothing. She's  
4 mad with me, so let it go." And then she was -- in Dubai she  
5 was like -- if we all go as a family, she would be doing  
6 something on her own, and the whole family would be going and  
7 doing something else.

8           Her family, obviously, thought there was some problem  
9 going on, and asked me many times. I was like -- in my mind  
10 I know that the other daughter is sick, so I didn't want to  
11 tell them.

12           And then she asked her sister to get some realtors so  
13 that we can go and look for houses over there. And also  
14 invites some of her friends who are in software, so that we  
15 can talk to them and figure out what kind of job, what's the  
16 salary, and everything else.

17           So the realtor comes and we see about two houses,  
18 totally broken down, which is like three times the cost of  
19 our house we bought in Shakopee. Dubai is one of the most  
20 expensive real estate in the world. We go there. It's  
21 completely broken down, the countertop is broken. Everything  
22 is just gone. And I ask, "Are you guys going to fix it?"  
23 They said, "No. This is what you get. You fix it." I was  
24 like, "I have a beautiful home in Shakopee." And then --  
25 it's in my mind, "Am I coming to this country and we'll fix

1 up homes?" And I don't have a job, what kind of job I'm  
2 going to get. I don't know anything about it.

3 And we saw two homes and one apartment. That's it. And  
4 then she said she is done with it.

5 Q So you returned?

6 A Yeah.

7 Q Without --

8 A Without nothing.

9 Q -- making a decision to move?

10 A She immediately decided, "I want to go back to the United  
11 States." So I said, "We have to go back to India because the  
12 ticket cost" -- like from the United States to Dubai to India  
13 and then come back to United States.

14 We go to India. She didn't talk to anybody in the  
15 family. She just locked herself in the room. Then the day  
16 before we were supposed to come, she said, "I need to buy a  
17 ticket. I have to go right away." I said, "One way ticket  
18 to go to India is \$1500, or so." We are leaving the next  
19 night and she's talking about the previous night.

20 Q So she was so impatient to get home --

21 A Yes.

22 Q -- she wanted to go a day ahead of time for \$1500?

23 A Yes. So I said that we are going the next day and somehow  
24 convinced her.

25 Even in India when we were there, she was -- if she

1 watches anybody on the phone, she would just lose it. Her  
2 brother-in-law is a businessman, so he's always on the phone.  
3 And she was getting mad at him. And I had to go and request  
4 her brother-in-law, "Can you please put the phone down," when  
5 he is around her. And even my brother. So that paranoid  
6 continued.

7 Q But you were trying to keep up with it?

8 A Yes.

9 Q That is, you thought that there was some way to have the  
10 situation normalized?

11 A Normalized, yes.

12 Q We are talking about 2010. You came back from the trip to  
13 India?

14 A Yes.

15 Q Now does the level of the concern about people talking on the  
16 phone, the laughter -- at what point -- would you say that  
17 that increased, or did it just stay at a constant level?

18 A No, it increased. In fact, all along the flight, it's about  
19 nine hours, so 17 hours flying time within the flight to go  
20 from Bombay to Minneapolis. And, of course, there's transit  
21 of four hours, or so. So we're talking about almost 24 hours  
22 of travel and a long -- actually, when done, we actually had  
23 to go to Dubai, and from Dubai we went to Paris, and from  
24 Paris to Minneapolis. So Right -- the flight from Dubai to  
25 United States, that is Minneapolis, she was continually

1 asking me, "Why are you doing this to me? Why are you doing  
2 this to me." I was not following what she was talking about.  
3 I was asking, "What am I doing to you?" We are in the  
4 flight. I'm sitting in one seat. The kids are -- we had the  
5 four seats like -- and then -- four, two and two  
6 (indicating).

7 Q Are the kids noticing anything at this point?

8 A No. At this point, they are still young. They don't  
9 understand much of it.

10 Q To your knowledge, when is the first time the children showed  
11 a reaction to their mother's --

12 A In 2012.

13 Q Okay. What happened then?

14 A So she went -- so this paranoid behavior continually keeps  
15 changing. Like suddenly she would accuse me, saying that I'm  
16 hypnotizing her. That was the accusation, that she's always  
17 telling me, "You are doing this to me. You are hypnotizing  
18 me." And she would constantly -- the kids are sitting and  
19 having dinner or lunch, or whatever, she would keep snapping  
20 her fingers in front of them, as if to wake them up from  
21 hypnosis. I would tell her, "What are you doing?" I did not  
22 know. I don't know what the snapping finger in front of the  
23 kids is going to wake them up from hypnosis. I have no idea.  
24 But she used to do that.

25 Her behavior was totally erratic. She would not keep

1 herself well. Her hair would be all on her face. And, to be  
2 very honest, there was times that I was looking at her I was  
3 scared, just to look at her because of her -- the way she  
4 portrayed herself with the hair. And then she had this habit  
5 of pressing herself in different parts of the body, and  
6 pressing the back of the neck. And she would just keep doing  
7 that. And I would, like, to try to talk to her, saying, "Why  
8 are you doing this," and, obviously, there is no  
9 communication.

10 Q This situation didn't change?

11 A No.

12 Q In 2010 or 11?

13 A No.

14 Q And it progressed?

15 A Yes, it progressed. And then she decided to baptize the  
16 girls, which I gave in. In Hindu culture the kids always  
17 follow the dad's religion. I'm a Hindu by birth. But she  
18 wanted to baptize them. I knew how much she wanted to  
19 baptize them because she is a Catholic, and she wanted the  
20 kids to be Catholic. And I said, "Okay. That's fine. You  
21 baptize the kids." I think, in my mind, maybe that might  
22 help a little bit to ease up the tension between both of us.

23 Her parents were here for the baptism. And I talked to  
24 them about all the things going on, and they said they don't  
25 want to talk to their daughter about this because they cannot

1 live fighting with their daughter 25,000 miles away from her.  
2 So, basically, they were scared that if they get into an  
3 argument and they have to leave, and she wouldn't talk. So  
4 they tried to play safe and they left. And the situation did  
5 not change.

6 Q When was the baptism?

7 A August or September of 2011.

8 Q Is there anything else you remember from 2011 that sticks out  
9 in your mind as what you and the children -- the atmosphere  
10 that you were living in, what you were dealing with?

11 A No. Socialization was practically zero as a family because  
12 she never used to come to anybody's house with us. I had to  
13 lie for her, basically. Because everyone would ask, "Where  
14 is mom?" Basically, every place we go, I had to lie.  
15 Eventually, the kids had to lie, too, because their friends  
16 were asking, "Where is mom?" And mom is not around, so they  
17 would say, "Mom is working," or mom is doing something else.  
18 They had to -- then I also used to think that is not the  
19 right way to bring up kids, telling them to lie about their  
20 mom, where the mom is. She is staying with us, right? But  
21 then that continued until 2012.

22 Q What happened in 2012?

23 A In 2012, about 5:00 o'clock in the morning in our master  
24 bedroom, I hear a big bang. And I just woke up. And I could  
25 hear her talking to herself, not screaming, just talking to

1 herself. And she is banging on the shower stall and banging  
2 on the kitchen -- the bathroom countertop.

3 And she walks out, and then I ask her, "Is anything  
4 wrong with you? I heard a big bang. Are you okay? Did you  
5 fall down?" She said -- obviously, there is no  
6 communication. She said, "That is none of your business."  
7 And she walks down and she starts banging on the kitchen  
8 countertop. And that continued for awhile. And then, after  
9 a few days, then I could hear screaming. And then after a  
10 few days, it was profanity.

11 Q Do you mean minutes?

12 A Few days, like maybe two days, she started screaming. And  
13 after two days, there was profanity when she was screaming.

14 Q Are you saying days?

15 A Days, yes.

16 Q All right.

17 A This is Easter Monday in the month of April. It's the  
18 birthday month for daughters, too, so we usually celebrate  
19 daughters' birthday very nicely.

20 So then about two weeks into this, at 2:00 o'clock in  
21 the morning or 2:30 in the morning, I could hear banging and  
22 screaming. And she was actually in the basement. And she  
23 was wrapping up gifts for the kids' goodie bags, at 2:30 a.m.  
24 or 3:00 o'clock in the morning, or so.

25 And then I go down and I ask her, "It's 3:00 o'clock in

1 the morning. Is that really important for you to pack goodie  
2 bags right now?" And she just lost it. And she just went  
3 upstairs and she started screaming and yelling, and that is  
4 the first time I heard that she was saying, "I'm going to  
5 kill you. I'm not going to let you live."

6 So during this two years of time, I had a very good  
7 friend who's a psychiatrist. They don't stay here. Now they  
8 stay in Boston. So I have been talking to him about all this  
9 stuff, and he has been educating me. And he told me one  
10 thing, "First of all, you have two kids and you have to go to  
11 work. And you leave the two kids with a person who seems to  
12 have some issues. But I have to tell you one thing, this is  
13 not an official thing, but this is just between friends, the  
14 moment you hear anything violent, you have to call the cops.  
15 You cannot just downplay it because that is going to get  
16 serious."

17 Q If you hear something violent?

18 A Violent, yes.

19 Q Is that the word?

20 A Yeah, hurting somebody or killing somebody, you have to call  
21 the cops. And he said, "But you cannot go" -- "take this  
22 legally because this is friendly advice. I'm a psychiatrist,  
23 but I cannot give you advice like that."

24 So he told me. So I had that in my mind. And this was  
25 the time when she started yelling about screaming and

1       killing. I wasn't sure who it was directed at. So then I  
2       called a couple of my friends. It was about 4:30 in morning.  
3       And there are only two people -- two family friends knew  
4       about the situation. Nobody else we told.

5               So they came over and one of my friends, they go  
6       upstairs and she was saying something like, "I'm going with  
7       the cops. Bye, bye." And some -- I don't know what else she  
8       was saying, but that is what she told the person, told them  
9       -- she was in communication -- there was a person, I don't  
10      know, social worker.

11   Q    Were the children awake?

12   A    The children were not awake at that time. It was about 4:30  
13       in the morning, or so. So the officers come, and then they  
14       took her away. And she was put on 72-hours hold, and then  
15       eventually she was committed.

16   Q    She was committed. And what happened then?

17   A    So she was -- during her whole time and until the commitment  
18       process, she wouldn't take any medication. She would say you  
19       have to force medication on her. She would not take any  
20       medication orally.

21               After the commitment, they had forced her to take  
22       medication, but still she did not take medication orally. So  
23       they had to give her shots.

24   Q    There was a court order?

25   A    Yes.

1 Q Allowing the hospital to administer the proper medication?

2 A Proper medication.

3 Q Okay.

4 A So I was told that she is not taking medication orally, so  
5 she had to be injected, basically, every day.

6 Q At some point, did she begin taking her medication  
7 voluntarily?

8 A Yes. Because she was admitted sometime in like May of 2012,  
9 and she was in the hospital for about a month, I think.

10 After she got back home, she was taking medication. It was  
11 hard on her initially because the medication was not suiting  
12 her. They had a lot of different combinations of medicine.  
13 And, eventually, it seemed that it was working on her. She  
14 was getting better.

15 Q When you say it was hard on her, what --

16 A It didn't suit her body. She was throwing up, and stuff like  
17 that, because the medicine didn't suit. And then they tried  
18 different combination, and everything. Eventually, whatever  
19 medicine was prescribed, that, I think, suited her. And she  
20 was getting much better.

21 I mean, the house seemed to come back on track. I mean,  
22 I remember the kids were so happy and we even got two dogs,  
23 two puppies, because Smeeta always had a puppy when she was  
24 growing up, and the kids are always fond of puppies. So we  
25 went and got puppies.

1                   And then the medication helped her to the extent that  
2                   she wanted to go to work. Then she started going to work,  
3                   and she joined a part-time job in my company where I'm  
4                   working. It was just four hours a day. It was perfect  
5                   because she would drop the kids off to school; come to work  
6                   for about four hours; and then go back; have lunch and go  
7                   back home and pick them up, so.

8 Q               Is being a working person, has that always been a source of  
9                   satisfaction for Smeeta?

10 A              Yes.

11 Q              Does she like that?

12 A              Yes. She was and probably is a very, very career-oriented  
13                   person. She takes her work very seriously. That is the kind  
14                   of person she is. She is very, very hard working, very  
15                   diligent, hard working. And she puts everything into her  
16                   work.

17 Q              So what happened with the part-time employment?

18 A              Yeah. So she did part time for, I would say, six months  
19                   because the contract was for six months, I think. And then  
20                   she taking her medication. And she used to see her  
21                   psychologist and psychiatrist. It was in the Jarvis  
22                   Petition, I believe, it's called.

23 Q              Jarvis?

24 A              Jarvis.

25 Q              Correct.

1 A The commitment, she just followed it to the T. Still, she  
2 did not -- she would take shots. She would go -- I would go  
3 with her, and she would take shots, although available as an  
4 oral medication, but she never agreed to them.

5 Q She never took oral medication?

6 A Yes. There was one medication that could have been taken  
7 orally, but she did not take it. So she always went and took  
8 the shots. Then she took medication for -- I think from June  
9 to February of 2013. Yes.

10 And then I still remember the day when we were going out  
11 bowling with a couple of our friends, and everything was  
12 coming back, like we were socializing. Things were getting  
13 back on track. And then she comes up and says, "I'm going to  
14 stop the medication." I said, "What?" "The doctor has not  
15 prescribed me medication. He or she asks me to just take  
16 medication if you need it." And I was, in my mind, "Which  
17 doctor would give a prescription and not ask you to take the  
18 medication," but then she said, "No. This is it. I'm not  
19 taking medication."

20 So the next day I asked her, "Will you be able to handle  
21 it without medication?" She said, "I will be fine. You  
22 don't worry about it." So I said, "That's fine." I would  
23 say this was a month of February, March, April.

24 And her contract ended in April. So I was asking her  
25 from March, "Are you planning to renew the contract?"

1 Initially, she said, "Yes, let me think about it." And then  
2 come the month of April, she said, "No, I'm planning to stay  
3 home with the girls through the summer, and then again  
4 working in fall." I said, "Yeah, that's fine. That is what  
5 you want, you do it."

6 And, of course, end of April it was the girls' birthday.  
7 We celebrated that. And starting May, all the symptoms came  
8 back. Everything. I mean, the symptoms that took about two  
9 years to develop came back in like one day. I could see  
10 everything in that. I still remember it was May 1st because,  
11 in India, May 1st is a holiday. I still remember the date  
12 that was the day.

13 And then the kids come from school and say, "Why is mom  
14 behaving again like this?" And I had no answer. I said,  
15 "She stopped taking medication." That is the only answer I  
16 have.

17 Q So the children were aware --

18 A Yes.

19 Q -- when the behavior started again?

20 A Yes.

21 And they kept asking me, "Papa, is mama going to get  
22 better soon because we really loved it when mama was like  
23 better," because that is their memory of their mom. Because  
24 before four years they are small. And then for -- then they  
25 have been going through all this screaming and yelling, and

1 all this stuff, and then suddenly they got a six-months patch  
2 where everything was normal. And they were very happy. And  
3 then, again, when it went down, they started getting very,  
4 very antsy about it. They wanted to know what is going on.

5 Q Are you still confused at this point? Are you still trying  
6 to make things better, or how are you dealing with the  
7 children?

8 A I mean, I educated myself. I did a lot of research about  
9 what is actually going on. And --

10 Q Did you do counseling for yourself?

11 A Yes. I started -- but that was not in 2012. I think it was  
12 late 2014, or so, I started counseling. Everybody was  
13 advising me, but my main focus was her and the kids, that was  
14 my focus.

15 Q And are you right now involved in some support groups?

16 A Yes, I am right now going through NAMI, one of the support  
17 groups for mental health.

18 Q That's N-A-M-I?

19 A National Alliance of Mental Institute, I think that is what  
20 it is.

21 Q So we need to get from 2013 to 2015. Is there a way for you  
22 to tell us what sticks out from that particular time period  
23 involving how you dealt with the behaviors, what the  
24 behaviors were, how the children responded?

25 A Back in 2013, she quit her job. Obviously, she didn't extend

1 her contract and she did not go back to work after she had  
2 the part-time thing. In late 2013, I think it was, September  
3 or October, I don't remember the month, there was a theft in  
4 our house, a burglary. And I had actually gone on with the  
5 girls to a friend's house. And she told me that she was not  
6 home. She said she had gone to a mall. And we had a theft  
7 where they came in and they only stole the jewelry from our  
8 house and an iPad. Those are the two things that they stole,  
9 nothing else.

10 I was like, how can a person come into the house -- I  
11 mean, in my house there are laptops and a MacBook, a lot of  
12 stuff there anybody could easily steal. But they just stole  
13 the jewelry and the iPad. And they -- I think they had  
14 stacked up -- I had a lot of shirts which were in the packet.  
15 And they stacked up all those shirts on a dresser, but I  
16 think they forgot to take it, or I don't know what happened.

17 So I come into the house. It was -- we left around 6:00  
18 o'clock, and I came back 9:30, or so. I come to the house  
19 and I open the workroom, and see a lot of checkbooks on the  
20 floor. Renelle is following me from upstairs, "Papa, you  
21 need to come up. You need to come up." I said, "Hold on.  
22 Let me just figure out why these checks are on the floor."  
23 Then I look at the drawer and all the checkbooks, the  
24 corporate account, the personal account, all the checkbooks  
25 are on the floor. I thought something is wrong. I thought

1 maybe she was looking for some checkbooks. And I didn't know  
2 there was some burglary going on, had happened.

3 Q Smeeta was not at the house at this time, right, at 9:30?

4 A She was in the house already.

5 Q She was there?

6 A Yeah.

7 So I go upstairs. I see the whole wardrobe, like all  
8 the dressers, all the clothes, everything on the floor,  
9 everything, including the walk-in closet. The clothes were  
10 on the floor and then they dumped -- we have an armoire in  
11 the bedroom. They put all the clothes out, and the jewelry  
12 was just like open.

13 And so I go there, and she was lying in the guest  
14 bedroom. This has just happened because I was out from 6:30  
15 to 9:30. So this is just a three-hour window. And then I  
16 come upstairs and I see all this clothes. And the jewelry is  
17 just behind the door, so we don't see it as you walk in.

18 So I just walk in and I see all these clothes. I was,  
19 in my mind, "What is going on here?" Then I walked to her  
20 room, and she was lying in the guest room. I said, "What is  
21 going on?" She said, "Why don't you go and check again?"

22 So I go back inside and I check again. That is when I  
23 realize the jewelry is stolen. And then I go down. And as  
24 soon as I realize the jewelry is stolen, I said, "I called  
25 the cops, 911." So I said -- I told her, "You have been in

1 the house before I came, right? So you should be calling  
2 911." Because it's dangerous.

3 We have a three-level home. They could be anywhere in  
4 the house, right? Who knows? "They are already gone." I  
5 said, "How do you know that? You don't know. You are lying  
6 upstairs in the bedroom. You didn't call 911." I mean, any  
7 person would call.

8 Anyway, I called 911. And then I had to convince her to  
9 get out of the house. She was not ready to get out of the  
10 house. The cops told me that you have to get her out of the  
11 house and the puppies because they want -- apparently, they  
12 come with guns. I don't know the process. They said they  
13 might have to come in with arms. So you -- everybody has to  
14 be out.

15 So I took the girls and went to the neighbor. I asked  
16 her to come, she denied it. She said, "I don't want to come  
17 to the neighbor." I said, "At least you need to be out of  
18 the house and out of the garage. You cannot be in the  
19 house."

20 And then the cops were there doing their fingerprinting  
21 and all that stuff. I went to neighbors and stayed there.

22 Q What is it that sticks out in your mind the most about this  
23 incident, then, as you were following through?

24 A Yeah. So there were a lot of communications with the  
25 investigating officer and us. And I made an invoice of the

1 receipts of the jewelry that I bought in the United States.  
2 And then there are a lot of jewelry that has been gifted by  
3 parents, like her parents, my parents, her sister and my  
4 sister. So I had a lot of jewelry for the kids and her, and  
5 everything was in there.

6 We had a lot of communication, and they couldn't find  
7 anybody. So they first doubted the maid and they had an  
8 inquiry with the maid, and everything was clear, I believe.  
9 And then nothing came out of it. The investigating officer,  
10 I think his first name is Jim, he sent me an e-mail with a  
11 list of items that were stolen somewhere in Dallas or in some  
12 other state, and asked me to go through. I said, "This is  
13 none of our stuff," and I forwarded to her, and she said,  
14 "No, this is not it."

15 And then the insurance gave -- I didn't have a jewelry  
16 insurance coverage. So she told me that it was approximately  
17 \$70,000 worth, I think 60 or \$70,000 worth of jewelry.

18 Q Does that square with your understanding --

19 A I don't know. Some of it was donated by her sister not  
20 donated, but gifted by her sister and her mom and dad. So I  
21 don't know. But she -- I don't wear the jewelry because it  
22 was all her jewelry. So she said it was 70,000, and I told  
23 the cops it was 70,000, "My wife is saying that it's 70,000."

24 And then, of course, I was called into the police  
25 station and I was asked about her because they had the

1 history of mental illness. And I strongly denied it. I  
2 said, "There is no way she would be responsible." No,  
3 because what happened, they had actually come into the house  
4 from the basement and they nicely cut the windows and placed  
5 it nicely outside, got into the house -- this is what I think  
6 happened because the glass was so neatly -- I think they had  
7 some kind of tool, and neatly stacked up. It was not thrown.  
8 It was nicely stacked up, and then they got inside from  
9 there, and they must have left from some other door. I don't  
10 know.

11 THE COURT: So, I'm sorry, but we need to take a  
12 recess. We've been going for about an hour and a half here.  
13 So we'll recess for about 15 minutes and then we'll resume  
14 testimony.

15 MS. MILLER: Thank you, Your Honor.

16 THE COURT: Thank you.

17 (WHEREUPON, a recess was had, after which  
18 the following proceedings were had.)

19 THE COURT: So we will resume testimony from Mr.  
20 Raghavan.

21 Ms. Miller, I appreciate the detailed history. A lot of  
22 this is documented in the custody evaluation. And it would  
23 be helpful if we could at least get to the issues in this  
24 case, and focus on those.

25 So why don't you re-take the witness stand, sir?

1 MS. MILLER: If I could have some exhibits marked,  
2 Your Honor.

3 THE COURT: You may.

4 BY MS. MILLER:

5 Q Mr. Raghavan, what, to you, is the importance of the incident  
6 with the burglary? Why is it still something that is part of  
7 the fabric and part of why you think it's an issue for this  
8 case?

9 A The fact that she claims that I have been paid by the  
10 insurance company for the \$70,000 and I did not pay her  
11 anything. And we have documentation to prove that I received  
12 \$5,800 for -- from the insurance company and another \$1,000  
13 for the window that was broken. That is it. There is  
14 nothing else.

15 Q I'm going show you three documents here marked 19, 20 and 21.  
16 Do you recognize these documents?

17 A Yes.

18 Q What, in particular, is document Number 19?

19 A This is, I think, the invoice of the window that was broken  
20 in the basement. Yes.

21 Q And what about document Number 20?

22 A I think this is a police report for the burglary that  
23 happened, that is 20.

24 Q And what about 21?

25 A And 21 is a reimbursement that I received from the insurance

1 company of the total claim, 7,276.01.

2 MS. MILLER: Your Honor, I would just submit these  
3 documents.

4 THE COURT: So, Ms. Antony, any objection to  
5 Exhibits 19, 20 and 21?

6 MS. ANTONY: (Indicating)

7 THE COURT: Is that a no?

8 MS. ANTONY: Yes, a no.

9 THE COURT: We just need you to speak out loud so  
10 my reporter can take it down

11 MS. ANTONY: I believe it just attests to the fact  
12 that we received 5800. It doesn't attest to the fact I --

13 THE COURT: Okay. But do you have any objection to  
14 the exhibits?

15 MS. ANTONY: No, nope.

16 THE COURT: Then Exhibits 19, 20 and 21 are  
17 received.

18 BY MS. MILLER:

19 Q Bijoy, you heard the judge explain --

20 A Yes.

21 Q -- that a lot of the data that is, you know, part of your  
22 history, yours and Ms. Antony's and the children's, is  
23 already part of both the psychological evaluation and the  
24 custody evaluation, and those witnesses are going to testify  
25 tomorrow. So, in terms of keeping a brief summary approach

1 to your history here with the children, did you have any  
2 direct safety concerns about the children?

3 A Yes, I do have safety concerns. When the kids go and visit  
4 her every other weekend, the fact that her driving is very  
5 bad. And there were incidents in the neighborhood where they  
6 had to call the cops and the cops had to come and put the  
7 driving -- I don't know what it's called, the speed thing.

8 Q It's an illuminated sign that says, "You're speed is"?

9 A Yes.

10 Q Okay.

11 A Even when the association approached her for the driving  
12 habit, apparently, I was told, that it did not go very well  
13 with her. So they had to post that sign for a couple of  
14 days, or so, in our neighborhood.

15 Q To the best of your knowledge, does this driving behavior  
16 still continue?

17 A Yes, it does.

18 Q And then the other part of the driving habits is I have been  
19 told by the kids numerous times that when she is driving  
20 she's continually banging on the steering wheel. She would  
21 roll down the windows even when it's cold outside. She would  
22 blast the radio to the maximum volume, and when the kids  
23 request mom not to do that, she would say, "No, that's none  
24 of your business. You have to deal with it."

25 And she had multiple driving tickets, like speeding

1 tickets. And I have sat with her in the passenger seat when  
2 we used to live together, and I have seen the same behavior  
3 from her and she would be -- the talking to herself is a  
4 constant phenomenon, it's like hallucinations, what you have,  
5 auditory, I don't know. But she'll be constantly talking to  
6 herself and then laughing out loud. And this has been  
7 reported to me by my kids, as well, even after we moved out.

8 And the screaming and yelling profanities have still  
9 continued. And they have come and told me, "Papa, mama does  
10 do it." And maybe the day we go she doesn't do it on a  
11 Friday or Saturday, but "Sunday, papa, she always does it."  
12 The last couple of times, it has been a little less because  
13 she has been working in the workroom for the pretrial and the  
14 trial case, so it was a little less -- they were a little  
15 less exposed to that.

16 But every time they have to go and visit the mom, their  
17 body language is different. They're antsy, they're anxious.  
18 They ask me, "How is mama going to be this weekend?" I would  
19 say, "I don't know, but you have got to go. That is the  
20 order, and I am not left with any options."

21 Q Do the children call you when they are with their mom?

22 A When they're allowed to call me they will call.

23 And the children do go to activities on Saturdays, also,  
24 but I was told by her that, "You cannot indulge into my  
25 time." It is a public facility. I can go and watch my kids

1 swimming. But she told me that she doesn't want me there. I

2 just let it go because I did not want to have any argument  
3 because the point is that the girls are going to go with her  
4 at the end of activities. I did not want to create a scene  
5 and make her angry while doing that. So I just stop going to  
6 the activities.

7 Q Can we talk a little about what you and the children -- the  
8 patterns that you and the children have developed since the  
9 Temporary Order in this case?

10 A Yes. The kids get up around 8:00 o'clock every morning; go  
11 to school; come back; have a snack. Then they practice on  
12 the piano for about 25/30 minutes. They do their reading.  
13 So that constitutes about an hour and a half of their reading  
14 time and piano time. And then I ask them to go do whatever,  
15 they play, watch YouTube, whatever they have. They just do  
16 their stuff.

17 And then around evening, I spend sometime asking them  
18 about their homework. If they have any homework, if they  
19 have anything to be submitted to the school, or any -- I  
20 mean, the school, they always have something going on, sign  
21 this form, or tomorrow is this day. So I do that.

22 And I try to teach them some stuff, like out of school,  
23 like math especially, focus on the math, maybe 15 or 20  
24 minutes. And then they can go to bed. Every day they go to  
25 bed by 9:15. They get a full almost 11 hours of sleep.

1 Q Are they still enrolled in the Edina school system?

2 A Yes, they are still enrolled.

3 Q Is it your intention to keep them in the Edina school system,  
4 if at all possible?

5 A If at all possible, yes. I'm working on the logistics, but,  
6 yes.

7 Q Are your children still involved in activities?

8 A Yes.

9 Q Besides the regular school day?

10 A Yes. They go to ice skating once a week. They go to  
11 swimming twice a week. They go to piano lessons once a week.  
12 And I believe, when they are with her, they attend -- they  
13 are in choir. So they go to choir practice on Sunday. Then  
14 they go to mass. And then, in the evening, I think it's  
15 called catechism class.

16 Q I'm going to show you a document that's been marked Exhibit  
17 6. Do you recognize that?

18 A Yes. And they also are enrolled in the band program at  
19 school. So this is the monthly payment for two instruments,  
20 two flutes. Both are into flutes.

21 Q Okay. So these are the activities --

22 A Yes.

23 Q -- and cost of the activities the children are enrolled in;  
24 is that correct?

25 A Yes.

1 MS. MILLER: I would submit this exhibit, Your  
2 Honor, Exhibit 6.

3 THE COURT: Ms. Antony, any legal objection to  
4 Exhibit 6?

5 MS. ANTONY: No.

6 THE COURT: Exhibit 6 is received.

7 BY MS. MILLER:

8 Q Are you in favor of the recommendations that have been  
9 offered by the custody evaluator in this case?

10 A Yes.

11 Q Is there anything more that you believe it's important for  
12 the Court to know regarding the children and their custody,  
13 their parenting time, in the future?

14 A I would agree with the custody evaluator's report, and that  
15 is what I am hoping that I will get.

16 Q And the custody evaluation report does recommend that you  
17 provide all the transportation for Ms. Antony's supervised  
18 time with the children. Do you understand that?

19 A Yes.

20 Q And you're in agreement with that?

21 A Yes.

22 Q If we could talk for awhile about your proposal for dividing  
23 up the household goods and furnishings?

24 A As far as the house goes, I think I'm in agreement it has to  
25 be sold and it has to be divided equally.

1 Q You mean the proceeds from the house?

2 A The proceeds from the house. We still have a loan on the  
3 house, so whenever it gets sold the proceeds from the house.

4 THE COURT: If I could interrupt. Do we have an  
5 evaluation on the home?

6 MS. MILLER: Your Honor, if the house is going to  
7 be sold, it appears to me it will sell at the value of the  
8 house.

9 THE COURT: So could we just have some testimony on  
10 the purchase price, the current mortgage balance?

11 MS. MILLER: Yes.

12 THE COURT: Thank you.

13 BY MS. MILLER:

14 Q Mr. Raghavan, what was the cost of the house when you  
15 purchased it in 2002?

16 A \$358,000.

17 Q \$358,000.

18 I'm going to show you a document that is marked Exhibit  
19 10. Do you recognize that?

20 A Yes. That is a 2017 Scott County evaluation of the property.

21 Q All right. You're not suggesting that the house is worth  
22 what is listed as the tax evaluation?

23 A No, I'm not.

24 Q What would be your best guess as to what might be a good  
25 price to ask for the house?

1 A I would say about \$450,000.

2 Q You'd like to try for that?

3 A Yes.

4 Q Okay. All right. I'm showing you another document. This is  
5 Exhibit Number 11. Do you recognize what that is?

6 A Yes. That's my loan with the Quicken Loans. And it has a  
7 loan balance of -- current principal balance is \$215,768.

8 Q Okay. So the balance on the loan is here in Exhibit 11?

9 A Yes.

10 Q And at least a rough idea --

11 A Yeah.

12 Q -- of the --

13 A Scott County tax evaluation.

14 Q -- Scott County tax evaluation?

15 A Yes.

16 MS. MILLER: Your Honor, I would offer these in  
17 evidence.

18 THE COURT: Okay. What are the numbers again?

19 MS. MILLER: Number 10 is the Scott County Tax  
20 Statement; and Number 11 is the balance on the current  
21 mortgage.

22 THE COURT: What was that balance again?

23 MS. MILLER: It was -- right here, the current  
24 balance \$215,768.83.

25 THE COURT: Thank you.

1           Ms. Antony, do you have any legal objections to Exhibits  
2           10 and 11?

3           MS. ANTONY: I do not.

4           THE COURT: Thank you. Those exhibits are  
5           received.

6 BY MS. MILLER:

7 Q       Mr. Raghavan, we have talked also about your proposal for  
8       dividing up the household goods and furnishings; is that  
9       correct?

10 A       Yes.

11 Q       And I'm showing you a document that's marked Exhibit 7. Do  
12       you recognize that?

13 A       Yes.

14 Q       What is it?

15 A       This is the division of the household goods and furnishings.

16 Q       And this represents your position on the issue for all of the  
17       household goods and furnishings; is that correct?

18 A       Yes.

19 Q       And, as a matter of fact, with the exception of a request  
20       that you divide equally the family albums --

21 A       Yes.

22 Q       -- and the collectibles, that is crystal figurines and  
23       crystalware --

24 A       Yes.

25 Q       -- correct? You would like to receive the piano?

1 A Yes.

2 Q Because the children are taking piano lessons?

3 A Yes.

4 Q What are you doing for a piano right now?

5 A I had to actually borrow a piano from my project manager at  
6 work, which I have to return back in a couple of months I  
7 think.

8 Q And then you are asking for two of the four bedroom sets?

9 A Yes.

10 Q And you're suggesting that Ms. Antony can pick which two  
11 those are?

12 A Yes.

13 Q You would like to receive one of the three TVs?

14 A Yes.

15 Q And you would like to receive the home theater system?

16 A If possible.

17 Q And you've detailed here the items that you --

18 A Yes.

19 Q -- say are involved in the home theater system.

20 And the children's personal belongings that you believe  
21 are still in the home?

22 A Yes.

23 Q With those exceptions, the kitchen, the family room, the sun  
24 room, the dinette, the formal living room and dining set, the  
25 furnishings and equipment in the computer room, the alter,

1 the basement furniture and all the accessories, the deck  
2 furniture, the six chairs, those you would say should be  
3 awarded to Ms. Antony; is that correct?

4 A Yes.

5 Q In terms of the items in the garage, you'd like to offer her  
6 first choice?

7 A Yes.

8 Q And then either the rest would be -- if usable, you would  
9 have it or, if not, it would be discarded; is that correct?

10 A Yes.

11 Q Your way of dividing this property rejects the notion of  
12 going through the house and trying to determine an exact  
13 value for every single thing; is that correct?

14 A That's right.

15 Q Do you understand, from the way you have proposed this  
16 division, that the items that are going to Ms. Antony greatly  
17 outweigh the items that are being awarded to you?

18 A Yes.

19 Q And that is your personal proposal to the Court?

20 A Yes.

21 Q And you're saying, in these circumstances, you'll call that  
22 fair and equitable?

23 A Yes.

24 MS. MILLER: Your Honor, I would offer Exhibit 7  
25 into evidence.

1 THE COURT: And, Ms. Antony, any legal objection to  
2 Exhibit 7?

3 MS. ANTONY: No.

4 THE COURT: Exhibit 7 is received.

5 If I could just inquire, while we are talking about the  
6 homestead, I understand the proposal to sell it and divide  
7 the proceeds. As a practical matter, do you have a plan for  
8 how that would happen?

9 BY MS. MILLER:

10 Q Would you like to speak to that, Mr. Raghavan?

11 A A lot of items need to be either donated or discarded in the  
12 house. So I would like to have access to the house and  
13 discard all those stuff which is just not usable or has been  
14 collected over years and just piling up in the store room or  
15 the exer -- we have an exercise room which is a store room.

16 So if she agrees to it, I just want to keep the house --  
17 make the house presentable before a realtor comes and looks  
18 at the house.

19 Q Your plan takes kind of a long look at things, doesn't it?

20 A Yes.

21 Q You wouldn't say the house has to be on the market in three  
22 weeks?

23 A No.

24 Q As a matter of fact, you picture that Ms. Antony will be able  
25 to move to an apartment temporarily and that you will move

1 back into the home?

2 A Yes.

3 Q Is that correct?

4 A Yes.

5 Q And your lease on your apartment ends at the end of January?

6 A That's right.

7 Q So that you would like to have you and the children back in  
8 the home, and that you be permitted to prepare the home for  
9 sale?

10 A Yes, if possible.

11 Q And that you would work cooperatively with Ms. Antony with  
12 respect to the price that is selected, with respect to the  
13 realtors, with respect to any offers that come --

14 A Yes.

15 Q -- through?

16 A And fixing up some stuff in the house.

17 Q Including, certainly, decluttering. Is there any other  
18 repair or maintenance that needs to be done?

19 A As far as -- I've not gone inside the house for almost 11  
20 months. I don't know the inside portion. But definitely the  
21 yard is in a very, very bad situation than when I had left 11  
22 months ago. I'm not sure -- that needs to be cleaned up,  
23 but, yes, that needs to be cleaned up if the house is going  
24 to be on sale in spring because I don't think it is a good  
25 idea to put the house on the market. So, by spring, I want

1 to get the house ready.

2 And then, inside, as far as I know, I think there are  
3 only a couple of things that need to be fixed, as to my  
4 knowledge when I left the house. I don't know what happened  
5 after that.

6 Q And what about the puppies?

7 A Puppies. Even before I filed a divorce, I had actually found  
8 a place for the puppies, after talking to my girls because  
9 they were okay giving away the puppies to a better family  
10 than us, but she denied it, saying that she needs the cost  
11 that the -- the money that we spent to buy the puppies. If  
12 she gets that money, then I can actually donate the puppies.  
13 I was not even going to sell the puppies, I was just going to  
14 give it to the family, but she denied it.

15 Q You believe that you are the appropriate person to be in the  
16 house and to be dealing with showings for the house?

17 A Yes.

18 Q And you recognize, by offering this plan, that you would be  
19 taking the children to school every day from Shakopee?

20 A Yes.

21 Q For the --

22 A Yes.

23 Q -- spring season, say?

24 A Yes.

25 Q As well as to all of their activities?

1 A Yes.

2 Q This practice of Ms. Antony's that I just mentioned of her  
3 asking for money -- asking to be paid for things, is that  
4 part of the behavior that started with her illness?

5 A Yes. She started -- I think it started late 2015, where she  
6 would just e-mail me an invoice every month and expect me  
7 just to pay whatever she claims that she has spent. I pay  
8 for everything in the house, mortgage, insurance, kids'  
9 activity fees, everything, even including because I go every  
10 weekend with my girls and buy the groceries. But still she  
11 would send me invoices. I still remember the month of April,  
12 it was close to \$7,000 sitting at home. And then I would pay  
13 as much as I can afford because sometimes it gets out of  
14 control.

15 I have been threatened to be locked out of the house if  
16 I don't get paid -- if she doesn't get paid by me. And there  
17 have been an incident where I couldn't pay her, I don't know  
18 what month it was, May or June, and she did not let me take  
19 the girls out for a weekend. She sat in the driver's -- or  
20 the passenger's side and left the door open so that I can't  
21 drive. I eventually take the girls to my neighbor and take  
22 their car and take them out.

23 So it's been very hard for me to manage the house as  
24 well as her expenses. And, of course, my main concern was  
25 the kids' emotional state, going through what they have been

1 going through for the past almost six years now.

2 Q Not wanting to expose the children to the conflict?

3 A Yes.

4 Q Bijoy, I'm going to show you two more exhibits. And I think  
5 I'm going to let you just look at them for a little bit.  
6 Exhibit Number 8, do you recognize that?

7 A Yes.

8 Q And Exhibit Number 9, do you recognize that?

9 A Yes. The Number 8 is my monthly outgoing for my current --

10 Q For your household?

11 A My household, my apartment.

12 THE COURT: Are you referring to living expenses?

13 MS. MILLER: We are, Your Honor.

14 THE COURT: Thank you.

15 THE WITNESS: Exhibit 9 is what I pay Smeeta for  
16 her living expenses.

17 BY MS. MILLER:

18 Q They are kind of cross -- I guess we got them right.

19 MS. MILLER: Your Honor, I'm going ask Mr. Raghavan  
20 -- I'm going to ask him some questions regarding these  
21 exhibits. Would you like them to be admitted prior to that?

22 THE COURT: I would. Thank you.

23 MS. MILLER: If I can return them to the witness.

24 THE COURT: Okay. Are you offering them now?

25 MS. MILLER: Yes, Your Honor.

1 THE COURT: Ms. Antony, do you have any legal  
2 objection to Exhibits 8 and 9?

3 MS. ANTONY: I do not.

4 THE COURT: Thank you. Eight and nine are  
5 received.

6 BY MS. MILLER:

7 Q Mr. Raghavan, Exhibit Number 8 taken first.

8 A Okay.

9 Q That is listed as your monthly budget, correct, Number 8?

10 A Yes.

11 Q That correctly states the apartment rent that you're paying  
12 and, due to the fact you're in an apartment, it's just  
13 electric; is that correct?

14 A Yes.

15 Q And this is the amount you're paying for the cell phone for  
16 you and the two children; is that correct?

17 A Yes.

18 Q But, in actuality, you have also been paying the cell phone  
19 expenses for Ms. Antony; is that correct?

20 A Yes.

21 Q As part of the December order?

22 A Yes.

23 Q You and the children have cable and Internet?

24 A Yes.

25 Q But you also -- and, I'm sorry, the cell phone for Ms. Antony

1 is on Exhibit 9, correct?

2 A Yes.

3 Q And Ms. Antony also has cable expenses and you are, right  
4 now, paying both of those?

5 A Yes.

6 Q Correct?

7 A Yes.

8 Q In your home, there is \$500 that is being spent monthly on  
9 groceries?

10 A Yeah, approximately.

11 Q All right. And you have been providing Ms. Antony with  
12 \$1,000 in maintenance?

13 A Yes.

14 Q In addition to paying the expenses for her?

15 A Yes.

16 Q And your estimation, and that is shown on Exhibit 9, your  
17 estimation is that once Ms. Antony has her living expenses  
18 paid for, her food, clothing, gasoline, dining out,  
19 entertainment, that would all total \$700; is that correct?

20 A Yes.

21 Q Now, the other expenses here include that you are paying only  
22 on your vehicle expense. Because the vehicle monthly payment  
23 of 412 that is over here, it's Ms. Antony's vehicle and it's  
24 being paid by you; is that correct?

25 A Yes.

1 Q What did you do for child care this summer?

2 A This summer my parents were here for almost five and a half  
3 months. So they came in the month of April and left the end  
4 of September. So they took care of my girls when they were  
5 home.

6 Q So your monthly average for child care has been about \$358,  
7 including over the summer; is that correct?

8 A Yes.

9 Q And next summer you will be paying expenses for child care  
10 for the children over the summer; is that correct?

11 A That's correct.

12 Q And that's why this number is increased to \$758?

13 A That's right.

14 THE COURT: Could I ask for clarification?

15 MS. MILLER: Absolutely.

16 THE COURT: I'm not sure where that number is  
17 coming from. Is it during the year; is it during the summer;  
18 is it a monthly figure?

19 MS. MILLER: The monthly average for child care,  
20 Your Honor, will go from \$358 a month with no summer child  
21 care to \$758 per month including summer child care and child  
22 care for those periods of time during the school year that  
23 there is no school.

24 THE WITNESS: That's right.

25 BY MS. MILLER:

1 Q Which is two weeks at Christmas, a week at spring break.

2 A One week at Thanksgiving, and then there are some MEA  
3 weekends and holiday school closings, and a few other days,  
4 too.

5 Q How much longer do you expect to be paying for the water  
6 heater in the homestead?

7 A I think it should be the end of this year, if I am not  
8 mistaken.

9 Q So if we look at Exhibit 8 and we look at your current  
10 monthly budget, which is the left-hand column, you would  
11 anticipate that, after the divorce, you would want to be in a  
12 home, but that you are imagining that your principal,  
13 interest, taxes and insurance for that home, which will be  
14 smaller than the one you're in now, will be approximately the  
15 same as your rental amount, correct?

16 A I think so. I don't know because Edina -- if I have to buy a  
17 small home in Edina, or a town house, or whatever, I don't  
18 know how much proceeds I would receiving to put toward the  
19 new house.

20 Q Exactly. But, at this point in time, it's your best guess;  
21 is that accurate?

22 A Yes.

23 Q So it is your statement to the Court that, once this divorce  
24 is over, you will have monthly living expenses of \$7,632; is  
25 that accurate?

1 A Yes.

2 Q Now this presumes that you're going to remain providing a  
3 home for the children, doesn't it?

4 A Yes.

5 Q And if we look at Exhibit 9, your best guess, post-decree, is  
6 that Ms. Anthony will be able to provide living quarters for  
7 herself, whether it's, again, a smaller town-home type  
8 setting, or a rental apartment or her own residence, and  
9 that, in order for her to provide food, clothing, her  
10 gasoline, her dining and entertainment, that would be an  
11 additional \$700 charge, correct?

12 A Approximately, yeah.

13 Q So that your best guess as to what Ms. Antony is going to  
14 need for her reasonable and necessary monthly expenses is  
15 approximately \$3,767?

16 A Approximately, yeah.

17 Q These are approximate numbers, and we know part of what is  
18 being calculated in here is the amount by which each of you  
19 will be able to buy down your mortgages, if you choose to buy  
20 something in the future?

21 A Yes.

22 Q So that your regular monthly payment is manageable?

23 A Yes.

24 Q Previously, we discussed what your income is, Mr. Raghavan.  
25 Do you recall that?

1 A Yes.

2 Q And you presented a document -- a text document that said  
3 your gross income was \$156,109?

4 A I think so.

5 Q It is what it is?

6 A It is what it is.

7 Q That document also details that you pay self-employment tax?

8 A Yes.

9 Q Of \$14,781?

10 A I think so, yeah.

11 Q And that you paid, in 2015, federal taxes of \$15,919?

12 A I think so.

13 Q I wouldn't lie to you, would I?

14 A It's the document. It is what it is.

15 Q And state taxes of \$7,335?

16 A I think so.

17 Q So when we subtract those amounts, even before we look at  
18 anything into retirement, or anything into savings, or any  
19 contribution to the children's educational fund, we are  
20 looking at a net annual resource of \$118,074. And if we  
21 divide that by 12, that gives you \$9,839.50 that's available  
22 to you to provide for your living expenses. And, up until  
23 now, also provide for Ms. Antony's living expenses?

24 A Yes.

25 Q Now, you and I have talked about the fact that Ms. Antony is

1 not currently employed; is that correct?

2 A To my knowledge.

3 Q And we have talked about the subject of maintenance; is that  
4 correct?

5 A Yes.

6 THE COURT: This might be a good time to recess for  
7 lunch, before we get into spousal maintenance.

8 I did have one follow-up question, just to clarify. In  
9 talking about living expenses, many times, when people are  
10 self-employed, they may be in a position to cover certain  
11 expenses through the business, telephone accounts, cars, and  
12 so forth. In this particular case, are any of the regular  
13 monthly living expenses covered through the business?

14 A I mean, what is in the document. My CPA does it, so I'm not  
15 sure.

16 Q Do you pay your insurance out of your personal account or out  
17 of the business account?

18 A Medical insurance?

19 Q Yes.

20 A Medical insurance I pay myself, and then I pay it to the  
21 insurance company, from the corporate account into the  
22 personal account, and then I send the check out.

23 Q So it comes from income --

24 A Yes.

25 Q -- that is -- right. So it's not written off as an expense

1 of the business?

2 A No.

3 Q Are there any expenses that you can think of that are written  
4 off as an expense of the business?

5 A Maybe the cell phone, but not all of it. A certain  
6 percentage, I think like 20 or 30 percent. I don't know  
7 myself. I have a CPA. I send my register to him, and he  
8 does everything and he files the tax. That is about it.

9 The only thing I know is I get an income, put it into my  
10 corporate account, and then whatever money I need for monthly  
11 maintenance, I transfer into my account, and then just write  
12 the checks. That is the standard. Federal and state tax all  
13 goes from my corporate account.

14 THE COURT: I don't think that answered the  
15 question, but let's recess for lunch and we'll try to figure  
16 it out later.

17 THE WITNESS: Okay.

18 THE COURT: So we'll plan to resume testimony at  
19 1:30.

20 MS. MILLER: Thank you, Your Honor.

21 (WHEREUPON, a recess was had,  
22 after which the following  
23 proceedings were had:)

24 THE COURT: Good afternoon. We'll go back on the  
25 record here in the Raghavan and Antony divorce trial. When

1 we recessed, Mr. Raghavan was on the witness stand  
2 testifying.

3 I will have you re-take the witness stand, sir.

4 Thank you. You are still under oath and I will turn  
5 back to Ms. Miller.

6 MS. MILLER: Thank you, Your Honor.

7 BY MS. MILLER:

8 Q Mr. Raghavan, when we broke for lunch, the judge had just  
9 asked clarifying questions on your income; is that correct?

10 A Yes.

11 Q And I was asking you if certain numbers were correct coming  
12 off your income tax return. Do you recall that?

13 A Yes.

14 Q And I was feeding you numbers, right?

15 A Yes.

16 Q To which your response was, basically, "If that is what the  
17 numbers say in the tax return," correct?

18 A Yes.

19 Q All right. Well, we got our heads together over lunch, we  
20 took a look at the tax return, and, in deed, my numbers are  
21 not what the tax return says; is that correct?

22 A Yes.

23 Q So if it pleases the Court, we'd like to go back to Exhibits  
24 1 and 2 and do some clarification about your income?

25 A Yeah.

1 Q Okay. So the first thing I'm going to do is put Exhibit 1,  
2 which has been received by the Court, and this is your  
3 corporate income tax, right?

4 A Yes.

5 Q Your S Corp.

6 A Yep.

7 Q All right. And can you identify on this page what amounts of  
8 money you drew out of your business for your income in 2015?

9 A Compensation charges of 89,781.

10 Q 89,781.

11 A Yep.

12 Q And from that number, your business paid a contribution to  
13 your medical insurance; is that right?

14 A Yes.

15 Q Okay. As a corporation, your corporation can't take that as  
16 a deduction?

17 A That's right.

18 Q But they can pay you the amount that you're expending for  
19 insurance, and then you can deduct it from your personal  
20 income; is that correct?

21 A That's right.

22 Q So the correct number is actually \$75,000 plus the 14,781; is  
23 that correct?

24 A Yes, that's right.

25 Q Which means your compensation is 89,781.

1           What else did you receive as compensation from your  
2           business?

3   A       The business contributed 18,750 to my SEP.

4   Q       Okay. 18,750 for your retirement. And then is there another  
5           contribution included there?

6   A       Yeah, it's 64,967.

7   Q       And, actually, that is the net income of the company?

8   A       Yes.

9   Q       Or very close to the net income of the company?

10   A       Yes.

11   Q       So that when we look at the compensation that you receive  
12           from your business, the numbers that we add are the 89,781?

13   A       Yes.

14   Q       The 64,967 and the 18,750; is that correct?

15   A       That's right.

16   Q       That amount is \$173,498; is that correct?

17   A       If that addition is correct. It looks right.

18   Q       So that's a gross of approximately how much per month?

19   A       14,500?

20           MS. MILLER: And I hope, Your Honor, that that  
21           answers the questions for what expenses might be paid out of  
22           his --

23           THE COURT: Well, it doesn't necessarily answer the  
24           questions about any living expenses that are run through the  
25           business.

1 BY MS. MILLER:

2 Q Well, are there any living expenses that are run through the  
3 business, Bijoy?

4 A That 64,967, that is the amount that is for the expenses of  
5 the house, basically.

6 Q Correct.

7 A In addition to the salary.

8 Q But you call that your earnings, correct?

9 A Yes.

10 Q All right. Does the business pay you anything for -- you  
11 said you got a portion of your cell phone expenses paid,  
12 correct?

13 A Yes.

14 Q Does the business pay you anything for any kind of travel?

15 A No, we have never done that before.

16 Q Does the business pay any expenses of -- what kinds of things  
17 even could you -- does the business purchase anything that  
18 isn't business related?

19 A No.

20 Q Okay. And you do have access to depreciation; is that  
21 correct?

22 A Only the vehicles, the one car that I have.

23 Q And if -- you can't deduct the expense of that vehicle?

24 A That's right.

25 Q So you have a loan?

1 A Yes.

2 Q But a portion of what is paid on that vehicle is depreciated;  
3 is that correct?

4 A That's correct.

5 Q That doesn't represent a payment to you?

6 A No.

7 THE COURT: I guess the relevant question is, is  
8 your client claiming living expenses that are actually paid  
9 by his business as business expenses, cell phone, Internet,  
10 car? Not money transferred to him as his income that he  
11 uses, but the business, itself. Does it pay for the things  
12 that he uses in his personal life?

13 MS. MILLER: Correct.

14 BY MS. MILLER:

15 Q Does your -- does the bill for your cell phone come to you or  
16 to the business? Is it in your name?

17 A I mean, I pay through my own personal credit card. But,  
18 again, the \$64,000 for a year is including every expense,  
19 like cable, cell phone. Everything is included, and that is  
20 clothing, household, prescription drugs, everything is  
21 included in that.

22 Q The business doesn't pay your cell phone?

23 A No. I mean, I you draw the check.

24 Q The business doesn't make your car payment?

25 A No.

1 Q You make that?

2 A Yes.

3 Q Personally?

4 A Yeah.

5 Q Out of your check?

6 A Yes.

7 Q And you could -- and that is demonstrated by the --

8 A Yes.

9 Q -- by the bank statements that we have in the record here?

10 A Yes.

11 Q The deductions for your payment for your car come from your  
12 personal account?

13 A Yes.

14 Q Not the business account?

15 A No.

16 THE COURT: Okay. Thank you.

17 BY MS. MILLER:

18 Q I believe we were talking, then, about the issue of  
19 maintenance, correct?

20 A Yes.

21 Q And you understand that this represents a payment for future  
22 expenses on the part of one spouse and paid by another  
23 spouse; is that correct?

24 A Yes.

25 Q And we've talked about the fact that two basic questions have

1 to be answered for the question of maintenance. One, does  
2 the spouse need it, does one spouse need it? And, two, does  
3 the other spouse have it?

4 A Yes.

5 Q As things stand today, do you believe Ms. Antony is in need  
6 of spousal maintenance?

7 A Yes.

8 Q Do you expect that that situation might continue for some  
9 time?

10 A I don't know.

11 Q Is it your hope that Ms. Antony would find a way to be  
12 treated for her illness and be able to resume a more healthy  
13 lifestyle than she does now?

14 A Yes.

15 Q And we've talked about how we should look at what is called  
16 the duration of spousal maintenance in light of the  
17 uncertainties in this situation; is that correct?

18 A Yes.

19 Q And it's your proposal that you be ordered to pay permanent  
20 spousal maintenance to --

21 A Yes.

22 Q -- Ms. Antony; is that correct?

23 A Yes.

24 Q And that, with this kind of an award to Ms. Antony, it would  
25 be possible to modify in keeping with the circumstances?

1 A Yes.

2 Q So we have gone over, before, the numbers that we think  
3 reflect Ms. Antony's needs at this point in time if she were  
4 to reduce the size of the residence and be able to meet the  
5 expenses of a smaller establishment; is that correct?

6 A Yes.

7 Q And we also -- in talking about what we believe the  
8 maintenance award should be, we also are thinking that Ms.  
9 Antony would -- we would reserve the payment of any child  
10 support from Ms. Antony at this time?

11 A Yes.

12 Q Is that correct?

13 A Yes.

14 Q So that, when you look at your expenses, you are looking at  
15 providing everything for the children, their food, clothing,  
16 their shelter, all of their activities, which we have  
17 provided, and that is almost \$1,000 per month. That is about  
18 700 by the time you have piano and ice skating and the --  
19 A Swimming and band program, yes.

20 Q Right. Okay.

21 And you would also be providing for their child care  
22 when you are working and they are not in school, correct?

23 A Yes.

24 Q So when we put the information together and when we talked  
25 about this again this afternoon, you and I used a calculator

1 that would take \$3,767 as the net that we believe Ms. Antony  
2 needs, and calculate what you would need to pay her because  
3 she would have to pay taxes on the amount she gets; is that  
4 correct?

5 A Yes.

6 Q And I'm showing you two items that have been marked for  
7 identification. This is Number 22. And do you recognize  
8 what that is?

9 A Yeah, that is the tax prediction worksheet.

10 Q And Number 23. Do you recognize what that is?

11 A That is a federal tax prediction worksheet.

12 Q So this calculation produces a sum of \$48,595 that would be  
13 adequate to meet the tax obligation so that Ms. Antony would  
14 come up with the 3,767; is that right?

15 A Yes.

16 Q And we made assumptions that she is single, that she doesn't  
17 have itemized deductions; is that correct?

18 A Yes.

19 Q And that she uses standard deductions and her own exemption,  
20 in terms of looking at the numbers that we put in here?

21 A Yes.

22 MS. MILLER: Okay.

23 THE COURT: And, Ms. Antony, do you have any legal  
24 objections to Exhibits 22 and 23?

25 MS. ANTONY: No.

1 THE COURT: Then Exhibits 22 and 23 are received.

2 Could I just ask, so the record is clear, what is the  
3 amount of spousal maintenance per month you're proposing?

4 MS. MILLER: \$4,050.

5 THE COURT: Thank you.

6 BY MS. MILLER:

7 Q Mr. Raghavan, at the time you were residing with Ms. Antony,  
8 did the two of you maintain a safe deposit box?

9 A Yes.

10 Q What items were stored in that safe deposit box?

11 A I think there were a lot of jewelry in there, which I have no  
12 access to right now.

13 Q You have gone to the bank since?

14 A Yes.

15 Q What happened?

16 A I tried both of my keys and it did not work. And the bank  
17 was actually puzzled why it was not working because they had  
18 the master key and my key but, apparently, Smeeta had gone  
19 and opened the safe deposit box and probably that's the  
20 reason it stopped working because she had to make a new key  
21 for the box.

22 Q And you would recognize the jewelry that would be in the safe  
23 deposit box that were gifts to Ms. Antony from her parents or  
24 other sources; is that correct?

25 A Probably, yes.

1 Q Most of it?

2 A Most of it, yes.

3 Q But you are asking that you and Ms. Antony go together and  
4 inventory that safe deposit box; is that correct?

5 A Yes.

6 Q Or any other safe deposit box that Ms. Antony may have set  
7 up --

8 A Yes.

9 Q -- since then.

10 Are there still items in storage that Ms. Antony  
11 maintained while you were married?

12 A When I was staying with her, she definitely had a storage  
13 place, but, as of now, I don't know if she has the same  
14 storage.

15 Q What items were in the storage locker?

16 A I don't know. A couple of occasions, when she got mad about  
17 something, she would just unplug all the electronics in the  
18 house, like receivers, DVD players, cable boxes, wires,  
19 everything, and she would just dump it in the storage. And  
20 then we did not have television in the house, like a cable  
21 box in the house, for about four to five months because all  
22 cable boxes were gone.

23 Q When you proposed the property division you proposed, have  
24 you taken into consideration whatever might be in that  
25 storage locker?

1 A No, I did not. I don't know what is there in the box.

2 Q Are you making any claim on anything in that storage locker?

3 A No, I'm not.

4 Q Mr. Raghavan, have you paid in advance all of the charges for  
5 the custody evaluation?

6 A Yes.

7 Q And for the testimony of the custody evaluator tomorrow?

8 A Yes.

9 Q How much was the custody evaluation?

10 A The custody evaluation, the initial charges were \$6,000 and  
11 the testimony is \$1500.

12 Q Have you paid all of the costs of the psychological  
13 evaluation?

14 A Yes.

15 Q How much was that?

16 A 5,500.

17 Q And have you paid for the testimony of the psychology -- of  
18 the evaluator here tomorrow?

19 A Yes.

20 Q What amount was that?

21 A 2,500.

22 Q And are you asking to have credit in the division of the  
23 marital property for the amounts that you have advanced?

24 A Yes.

25 Q And are you suggesting that it would be fair that each -- you

1 and Ms. Antony both pay one half of these expenses?

2 A Yes.

3 Q And, in addition, you're asking for one half of the  
4 additional expenses that you had to incur to provide  
5 furniture, beds, dressers, dishes, table, for your children,  
6 right?

7 A Yes.

8 Q When you moved out.

9 And that would be one half of that 8,000 some amount --

10 A Yes.

11 Q -- that we talked about.

12 Mr. Raghavan, you talked a lot this morning about things  
13 that haven't been in your control for a long time?

14 A Yes.

15 Q And as we approach looking at once you are no longer Ms.  
16 Antony's husband, and as we look at your responsibilities for  
17 being financially responsible, to some extent, for her and  
18 your family, responsible for the children, as well, do you  
19 believe that Ms. Antony has the ability to perhaps have an  
20 income source of her own?

21 A If she decides to work.

22 Q What about something like social security disability?

23 A That's an option, too.

24 Q And, as a matter of fact, you would like to have the  
25 permanent maintenance award contingent on Ms. Antony taking

1           advantage of all of the potential income sources that she may  
2           qualify for that are consistent with her situation?

3   A       Yes.

4   Q       Is that correct?

5   A       Yes.

6           I have these two sheets here (handing).

7   Q       These have already been admitted.

8           MS. MILLER: Your Honor, I believe that those are  
9           all the questions that I have for this witness at this time.

10          THE COURT: Thank you.

11          I need clarification on a couple of things. We talked  
12          about motor vehicles. I don't believe I heard exactly from  
13          your client how he wanted those divided.

14 BY MS. MILLER:

15 Q       Mr. Raghavan, you are currently driving which vehicle?

16 A       I'm driving the Mazda; and Smeeta is driving the Toyota.

17 Q       And you would like to be awarded the car you are currently  
18       driving?

19 A       Yes.

20 Q       And Ms. Antony be awarded the car she is currently driving?

21 A       Yes.

22 Q       Subject to the encumbrance on the vehicle?

23 A       Yes.

24          THE COURT: Thank you.

25          And then, as far as health insurance for Ms. Antony, I

1 understand that your client pays for that right now. What is  
2 the plan going forward?

3 MS. MILLER: I'm not sure, because of how the  
4 health insurance is structured, if we have any COBRA options.

5 THE WITNESS: I have no idea. I have been  
6 providing insurance for my family. I have to buy my own  
7 insurance for the four of us.

8 THE COURT: The question would be, is your client  
9 willing to continue providing that?

10 MS. MILLER: Your Honor, we did provide that Ms.  
11 Antony -- in our projected expenses, we provided that Ms.  
12 Antony would be responsible for her health insurance.

13 THE COURT: Thank you.

14 And based on those few clarifications, any other  
15 questions for your client?

16 MS. MILLER: I realize I left out one exhibit.

17 BY MS. MILLER:

18 Q Mr. Raghavan, I'm going to show you an exhibit that has been  
19 marked Number 12. Do you recognize that?

20 A This is my attorney fees.

21 Q And you smile when you say that. Now that's gracious.

22 How much has been the total amount that you have  
23 incurred in attorney fees in this matter?

24 A As per this document, until October 4th, it's about \$16,423.

25 Q And you've actually paid?

1 A 7,500.

2 Q Okay. And you would like the fact that you have been solely  
3 responsible for the attorney fees in this matter to be  
4 reflected in the property division; is that correct?

5 A Yes.

6 THE COURT: Just to clarify, is your client  
7 requesting an award of attorney fees?

8 MS. MILLER: I believe, Your Honor, he's asking for  
9 a property division that considers the debt that he's  
10 incurred for it.

11 THE COURT: Would that not be the equivalent of an  
12 award for attorney fees? Is that need based or conduct  
13 based?

14 MS. MILLER: Your Honor, I believe that it's  
15 conduct based. I am just -- we have had an extreme amount of  
16 information to wade through in this case that's been very  
17 confusing and very --

18 THE COURT: Well, you can make that argument, but,  
19 given the circumstances in this case, we'll just leave it at  
20 that.

21 MS. MILLER: Okay. We will leave it at that.

22 I have no further questions, Your Honor, for Mr.  
23 Raghavan.

24 THE COURT: Thank you.

25 So, Ms. Antony, at this time, you have the right to

1 cross-examine Mr. Raghavan about his testimony.

2 So cross-examination means you may ask him questions,  
3 specific questions, about his testimony to test its weight  
4 and credibility and/or to clarify it. It is not an  
5 opportunity for you to testify. You will have a chance to do  
6 that latter in the trial, if you wish.

7 Do you understand?

8 MS. ANTONY: Yes, I do.

9 THE COURT: And do you have questions for Mr.  
10 Antony --

11 MS. ANTONY: Mr. Raghavan.

12 THE COURT: I'm sorry, for Mr. Raghavan. Thank  
13 you.

14 CROSS-EXAMINATION

15 BY MS. ANTONY:

16 Q In your testimony you state, "That she was very different the  
17 day after the surgery. She was increasingly paranoid. She  
18 felt like people were looking into the house. She was afraid  
19 of the lights. She freaked out around telephones. She  
20 believed the FBI was tracking her through microwave  
21 technology. She believed that people were tracking her key  
22 strokes." Do you have any evidence for that? Do you have

23 any other bystander that heard any of these statements?

24 A No.

25 Q Are these just your statements then?

1 A This is what I observed.

2 Q You state that she was in public places and, if she saw  
3 someone on the phone, that she would walk up to the person  
4 and she would laugh hysterically by that person. Do you have  
5 any evidence for that?

6 A No.

7 Q Did people around you in public places get concerned when she  
8 laughed hysterically by that person?

9 A Yes.

10 Q Did they not call in reports?

11 A Yes.

12 Q Between 2010 and 2015?

13 A Yes.

14 Q Which reports were they?

15 A In the school.

16 Q Where are the reports?

17 A There was Child Protection Services involved because of your  
18 action in the school choir. And you were in the back row  
19 screaming, and the all the parents three or four rows from  
20 you went and complained to the principal, saying, "There's a  
21 lady screaming there and yelling profanities with all the  
22 kids in the choir and all the parents sitting." And when the  
23 choir was over, those parents were actually watching to see  
24 where the girls are going after the choir, and the girls ran  
25 toward me because I was also present in the same choir, and

1 they came toward me. And then the parents decided, "Okay,  
2 that is better because we are assuming he is their dad."

3 Q Okay. That is in 2015. What about between 2010 and 2015?

4 You said, "Right after surgery, she displayed hysteria from  
5 the get go." "She was hysterical from the get go, and she's  
6 laughing in public places from the get go."

7 MS. MILLER: Your Honor --

8 THE COURT: Is there an objection?

9 MS. MILLER: I would object that the questions do  
10 not reflect the testimony that's been challenged.

11 THE COURT: Sustained.

12 MS. ANTONY: He did testify to that, Your Honor.  
13 Is there not a --

14 THE COURT: I suggest -- Ms. Antony, I sustained  
15 the objection. I would suggest that rather than you trying  
16 to recite the testimony, that you just focus on the questions  
17 you would like him to answer.

18 BY MS. ANTONY:

19 Q Is there a report between 2010 and 2015 reflecting concerns  
20 of hysterical laughter in the community and in public places?

21 A No.

22 Q For the Court's benefit, during this paranoid phase, while  
23 she's exhibiting all of this paranoia, what is she doing  
24 inside of the house?

25 A Can you rephrase that?

1 Q During this paranoid phase beginning in 2010, she's  
2 exhibiting all of this paranoia, she's making statements, she  
3 hurting herself --

4 A I never said hurting herself.

5 Q Did you say she's pushing down on herself, something like  
6 that?

7 A Pressing on your body. I never said hurting yourself.

8 Q So, for my benefit, would you rephrase the symptoms that I'm  
9 displaying inside of the house? I recall you saying that I  
10 freaked out around phones. What is it after that that I did,  
11 and consistently for five years?

12 A Consistently screaming, screeching, yelling profanities in  
13 the house, where the neighbors are witness to that, and doing  
14 this in front of the kids. And the kids come and calling me  
15 at work saying, "Mama has been swearing and we are scared."  
16 "Mama swore 146 times today." And they -- when I come back  
17 from work -- I ask them, "Should I come home," and the answer  
18 they give is, "If you come home, if you talk to mama, mama  
19 will get mad at you, and then the cops will be at the house."  
20 That is their response.

21 Q Can you relate a scenario -- for instance, I wake up in the  
22 morning, and then what happens?

23 A Yeah. You wake up in the morning and you go to one of the  
24 bathrooms, either the master bathroom or guest bathroom.  
25 And, for awhile, maybe ten minutes, it's quiet. And, after

1 that, I can hear the screaming start. This is like 4:00  
2 o'clock, 4:30, in the morning. And I can hear banging on the  
3 shower stall. And this continues until you're out of the  
4 bathroom, and then you go down.

5 There is no consistent manner that you do. So I have to  
6 move the kids from one room to the other because I try to  
7 figure out which bathroom is mama going to go the next time?  
8 Because the way the bathroom is organized, one bathroom is  
9 connected to Raeanna's room, and the another is to Renelle's  
10 room. So I have to, "Today let's try sleeping together in  
11 Raeanna's room and hope that mama goes to the other room."  
12 So when we wake up in the morning and you go to the other  
13 bathroom, I have to wake up the girls and move them to the  
14 next room because I don't want them to wake up in the morning  
15 and listen to this screaming and this yelling. I have told  
16 you number of times, "Do not do it in front of the kids." We  
17 have a huge house. You can go to the basement; you can go to  
18 garage; you can go to any of the rooms when the kids are not  
19 there," so that they don't hear this and they don't go  
20 through this every day of their life. You tell me, "It is  
21 their fate. They have to live with it until they get out of  
22 this house."

23 THE COURT: I'm not sure this is helpful. This is  
24 becoming non-responsive. We have to maintain a  
25 question/answer format and, at a certain point, questions of

1 the sort that are being asked are going to become repetitive.

2 MS. ANTONY: I'm trying to get a sense for the  
3 statement, as to whether it was on a daily basis.

4 THE COURT: Cross-examination is not really meant  
5 to simply give a person a chance to repeat their testimony;  
6 it's meant to question and test their testimony.

7 MS. ANTONY: I don't think specifics were stated.

8 Now we do know it's on a daily basis.

9 BY MS. ANTONY:

10 Q Do you think -- why do you think she does it? Why do you  
11 think she's screaming?

12 A Because you're not well.

13 THE COURT: The Court is going to object to that.  
14 There is no foundation for that question, or no foundation  
15 upon which this witness can answer that question.

16 Let's move on.

17 BY MS. ANTONY:

18 Q You state in your testimony that she has control, that she is  
19 able to control herself and exercise control over herself.

20 Do you think she can if she has a need to scream every single  
21 day?

22 A Sometimes you do.

23 Q Where do I exercise control?

24 A Some public places, not all.

25 Q Between 2010 and 2015, does she drop the kids off to school

1 in the morning?

2 A Yes.

3 Q Does she walk the kids to the -- does she walk the kids to  
4 the school, being that she takes the kids to the classroom  
5 inside the school?

6 A I don't know.

7 Q 2010, were the kids four years of age?

8 A Yes.

9 Q Were they in kindergarten or Pre-K?

10 A Kindergarten maybe.

11 Q Was it the requirement of the elementary school that a parent  
12 walk them to a classroom?

13 A I don't know --

14 MS. MILLER: Objection, Your Honor. Mr. Raghavan  
15 has stated that he does not know what happened when the  
16 children got to the school.

17 MS. ANTONY: It speaks to the fact that she is in  
18 the school for 15 or 20 minutes each morning.

19 MS. MILLER: Your Honor --

20 THE COURT: So there is an objection here. I  
21 believe the objection is that the witness has no personal  
22 knowledge and has already answered the question. So I'm  
23 going to sustain that objection.

24 And let's move on.

25 BY MS. ANTONY:

1 Q All right. She does drop the kids to the school, and you do  
2 not have any knowledge of the fact -- as to whether or not  
3 she is required to walk the kids to the school; is that true?

4 A Yes.

5 Q Does she take the kids to activities?

6 A Yes.

7 Q Does she take the kids to music once a week?

8 A Yes.

9 Q Does she take the kids to swimming?

10 A Yes.

11 Q Does she take the kids to dancing?

12 A Yes.

13 Q Does she take the kids to church?

14 A Yes.

15 Q Between 2010 and 2015, for all of this time, she -- there is  
16 not one report in the community. Does she interact with  
17 accountants between 2010 and --

18 MS. MILLER: Excuse me, Your Honor. I believe that  
19 Ms. Antony did not ask a question.

20 MS. ANTONY: I just simply restated --

21 THE COURT: I believe the question is relating to  
22 the witness' observations of activities she has engaged in  
23 over the past few years. I believe it was a question. So  
24 overruled. The witness may answer, if he is able to.

25 THE WITNESS: Can you rephrase that?

1 BY MS. ANTONY:

2 Q Does she interact with accountants between 2010 and 2015?

3 A Possibly once a year.

4 Q Between 2010 and 2012, are there quarterly reports that need  
5 to be filed with the accountant?

6 A Yes.

7 Q Is that once every three months?

8 A Yes.

9 Q Does she have those meetings once in three months?

10 A Not necessary.

11 Q In your opinion, she did not meet with the accountant once in  
12 three months?

13 A I never said that. I said it's not necessary that you have  
14 to meet. You can e-mail the document to him, too. That is  
15 what we have done in the past, also.

16 Q Was she handling the corporation finances between 2010 and  
17 2012?

18 A We were handling the corporate finances.

19 Q Were you documenting the registers?

20 A You were typing it and I was sitting right by your side.

21 Q She maintained the registers in every single transaction; you  
22 sat by her side?

23 A Yes.

24 Q The home register, every single transaction, you sat by her  
25 side?

1 A I don't know what is a home register.

2 Q Were there registers that documented home transactions?

3 A I know the company register.

4 Q Why did you need to sit by her side?

5 A Because we managed the corporate accounts.

6 Q What does that mean?

7 A We both were together with the corporation.

8 Q What does that mean, when you sit by her side?

9 A Just help you out.

10 Q What is it that you do?

11 A Just some calculations, adding up stuff, pulling our bills  
12 and adding up the bills, tallying up the numbers, and you  
13 would key it into the register.

14 Q Have you seen the registers in the home?

15 A What do you mean by "seen the registers"?

16 Q Have you seen -- since I'm typing up the registers and  
17 maintaining the registers, and you kind of give me some  
18 numbers off some bills, have you actually seen the registers  
19 at home?

20 A Yeah, it's on Quicken. It's on the computer.

21 Q Have you ever managed the registers?

22 A Yes.

23 Q You entered transactions --

24 A Yes.

25 Q -- into the registers?

1                   So you have seen the registers?

2   A    Yes.

3   Q    You are aware that all the transactions were documented in  
4   the house?

5   A    All the corporate transactions, yes.

6   Q    Were you -- are aware all the financial transactions for the  
7   home are documented?

8   A    Corporate expenses are documented in the corporate register.  
9   That could include home expenses, too.

10  Q    You're not aware of a separate home register?

11  A    I have not seen one.

12  Q    Okay. Are you aware that savings were grown to 40 grand  
13  before I was committed in 2012?

14  A    I do not know.

15  Q    You do not know.

16                   After 2012, when she returned to work after the  
17  commitment, when she got back from commitment and she  
18  returned to work, are you aware of what she earned during  
19  that six-month contract?

20  A    No, I don't.

21  Q    Did those earnings go to a joint pool?

22  A    The went to the corporate account.

23  Q    Is that a joint pool?

24  A    It's a corporate account.

25  Q    Is that a joint pool?

1 A It's a corporate account.

2 Q Is that in your name or my name then?

3 A It is in the corporation's name.

4 Q Who are the owners of the corporation?

5 A I'm the president; you're the vice president.

6 Q It's a joint account, then.

7 Okay. Were you aware that the Respondent earned 66

8 grand?

9 A When?

10 Q On that six-month contract?

11 A No.

12 Q You're not aware. Okay.

13 MS. MILLER: I didn't hear the number.

14 THE WITNESS: She said 66,000.

15 MS. MILLER: Are we aware that she earned --

16 THE WITNESS: 66,000 during that time frame.

17 BY MS. ANTONY:

18 Q Between 2010 and 2012, clearly she has FaceTime, as per what  
19 you stated and as for what she said. She is with instructors  
20 for at least an hour every single day around her children and  
21 around other people's children?

22 A With instructors, meaning what? What are you doing in ice  
23 skating sessions?

24 I'm not following the question here. What does with  
25 instruction -- instructors mean? Actually, in ice skating

1 and swimming --

2 THE COURT: You're not asking the question, sir.

3 I believe the witness needs clarification. Can you  
4 reask your question?

5 BY MS. ANTONY:

6 Q Is she in a public place with children ice skating, parents  
7 watching ice skating, in a public place?

8 A Yes.

9 Q And children are around?

10 A Yes.

11 Q Swimming, kind of the same?

12 A Yes.

13 Q Music, FaceTime with an instructor?

14 A In the past.

15 Q But that is true?

16 A Yes.

17 Q Did she volunteer at school at all between 2010 and 2015?

18 A I don't know.

19 Q Okay. And you have not heard of any reports, between 2010  
20 and 2015, of slapping herself from these instructors, or  
21 profanities or hysteria?

22 A I have heard parents coming to me at the ice skating rink and  
23 asking me to control my spouse.

24 Q Between 2010 and 2015?

25 A Yes.

1 Q But no reports logged?

2 A No reports.

3 Q They were not concerned?

4 A About?

5 Q About the profanity in the rink. I'm screaming profanities,  
6 and they're not concerned?

7 A That is the reason they came to me.

8 Q They come to you, but they didn't log a report?

9 A They did not do that.

10 Q Okay. Do you know what she looks like when she's screaming  
11 profanities? Is she just walking around? What is she doing  
12 when she's screaming profanities? You said in the bathroom.  
13 The bathroom door was locked. Anywhere else?

14 A All over the house.

15 Q All over the house. What does she look like?

16 A I don't understand the question.

17 Q What does she look like when she's screaming? Is she talking  
18 to imaginary friends? What is she screaming at? Is she  
19 screaming at you? Is she screaming at the children? What is  
20 she screaming at?

21 A She is talking to some person, I don't know who. But she is  
22 looking sideways, getting mad. If you have some spoons or  
23 some knife or cleaning vessels, you'll be just violently  
24 pointing to the side and just talking. Sometimes that talk  
25 transfers into laughter and then, after awhile, the laughter

1 transforms into anger.

2 So it's a continuous up and down, and there's no  
3 consistency of this. This is what happens. And sometimes  
4 you just calm down.

5 Q Why do you think, when she steps out of the house, she  
6 doesn't feel the need to do that?

7 A I am not an expert.

8 Q That doesn't concern you? You said you educated yourself on  
9 schizophrenia --

10 MS. MILLER: Objection, Your Honor. The witness is  
11 arguing.

12 THE COURT: It's argumentative. Sustained.

13 BY MS. ANTONY:

14 Q Did you educate yourself on schizophrenia?

15 A Yes.

16 Q From your education, do you think schizophrenics can control  
17 themselves?

18 A Yes.

19 Q So schizophrenics are talking to themselves, in your opinion,  
20 but schizophrenics, when they get outside of the house, don't  
21 feel the need to talk to themselves?

22 A You do talk. You can talk in the car. You do scream in the  
23 car, bang the steering wheel. You do laugh in the car.

24 Q Okay. But not in a person's presence. So in the house and  
25 in the car?

1 A I'm not with you always.

2 Q Are there plenty of celebrations inside of the house?

3 A Yes.

4 Q Do large crowds come to the house?

5 A Yes.

6 Q Do you have pictures of me screaming?

7 A I'm not walking around with a camera in the house, taking

8 pictures of you screaming.

9 Q Why not? Aren't you living in fear?

10 A Why should I?

11 Q Don't you want to have some evidence of how bad my illness

12 is?

13 A I didn't feel the need to take pictures of my spouse.

14 Q You didn't feel the need to record me?

15 A No.

16 Q Is it concerning to you that I'm so ill on the inside of the

17 house but I can walk into a classroom and I can sit in the

18 classroom and not scream?

19 A I'm not with you in the classroom.

20 Q But you don't have a report?

21 A I wouldn't know.

22 Q Okay. Does the fact that one incident of screaming in the

23 auditorium logged a report, and so many incidents at school,

24 where she is there, and the fact that there isn't a report,

25 doesn't that not infer that she did not scream? Is that not

1           concerning to you?

2   A       I don't think so.

3   Q       She is mentally ill. Do you not want to understand why she  
4           is mentally ill?

5   A       You were committed once already, so I don't ever infer.

6   Q       According to you, beginning 2010, every single day she's  
7           stark, raving mad inside the house, but not outside of the  
8           house. Is that not concerning to you?

9   A       I already said you do do it in the car.

10  Q       Okay. In the house and in the car, even more concerning. In  
11           the house and in the car, but she's outside every single day.  
12           She's grocery shopping; she's at classes; she's at school;  
13           she's not doing that.

14  A       I wouldn't know that.

15  Q       You don't have any reports. Do you think -- do you think  
16           that a parent -- if there is one incident, they will do a  
17           report right away? Do you actually believe parents would not  
18           call it in for five years?

19  A       That is why they went to the principal and talked about it.

20  Q       One report in 2015?

21  A       I don't know what the process of school is.

22  Q       Okay. You said -- you said that we were stolen of 70 grand  
23           of jewelry in 2015?

24  A       That is what you claimed. You told me that it's 70,000 worth  
25           of jewelry.

1 Q In your opinion, what do you think it was worth?

2 A I don't know.

3 Q Do you have inventory of the jewelry?

4 A I don't know.

5 Q You said in a safety deposit box that there was plenty of  
6 jewelry?

7 A I said some of the jewelry, some old jewelry that you don't  
8 wear.

9 Q Old jewelry, as to not plenty, some?

10 A There might be some left which were not stolen.

11 Q Okay. How much do you think was in the house?

12 A I don't know.

13 Q Not even a remotest clue?

14 A The only thing I know is the stuff that I had the receipt  
15 for, which I submitted to the insurance company.

16 Q What were those items?

17 A I think it was -- one -- the thing I remember is my watch,  
18 which cost -- I think you bought it for me for like \$3,000,  
19 or something like that. And then there were -- the diamond  
20 ring, about \$500. And there was one additional item, I don't  
21 remember. That was about a total of \$10,000.

22 Q You said a whole bunch of receipts. So three items?

23 A Three items, yeah.

24 Q Okay. During 2010 and 2012, she's screaming away; she's

25 laughing away; she's hitting herself. She's not even looking

1 at the children, she's just screaming. Is she able to do any  
2 work inside of the house?

3 A I don't know.

4 Q Did you cook?

5 A No.

6 Q Did you clean the house?

7 A Yes.

8 Q Were there maids in the house?

9 A Once a month.

10 Q Once in a month?

11 A Yes.

12 Q Did she clean bathrooms?

13 A Yes.

14 Q Okay. Did -- does she do the laundry in the house?

15 A We both did.

16 Q She is -- registers are still being maintained. You're not  
17 aware of a home register, get that. Corporate register,  
18 you're still sitting by my side?

19 A We maintained the corporate register.

20 Q Have you seen a copy of my credit card statements?

21 A No.

22 Q You have not seen a copy of credit card statements?

23 A No, since a long time.

24 Q Are you aware that she's getting outside the house at all  
25 during the day?

1 A I wouldn't know.

2 Q Is it your belief that, while she's cooking, cleaning, doing  
3 stuff around the house, and you do not know what my day is  
4 like during the day, that she's continuously screaming  
5 because you see me screaming in the morning and cooking --  
6 over the weekends you potentially see me screaming while I am  
7 cooking?

8 A Yes.

9 Q So every single day, how do I get work done? How do I do it?  
10 I'm sitting before the computer, I'm screaming away. How do  
11 I do it?

12 A I don't understand the question.

13 Q Well, according to you, I'm screaming and laughing  
14 hysterically. I could be cooking, and I'm just looking at  
15 people and I'm just continuously laughing. How do I cook  
16 food? How do I do it?

17 A You do it. You're standing there cooking and doing all this  
18 stuff while cooking.

19 Q That is not concerning to you? I'm actually working and  
20 hysterically laughing and screaming away and I put food on  
21 the table? That is not concerning to you?

22 A What option did I have?

23 Q What kind of illness is that? How can a person that lunatic  
24 get anything done?

25 THE COURT: I'm going to stop you, Ms. Antony.

1 This just argumentative.

2 MS. ANTONY: Okay.

3 THE COURT: There is nothing -- the Court is  
4 interested in hearing testimony about the issues the Court  
5 has to decide. This is not helpful.

6 MS. ANTONY: Well, actually, ma'am, it goes to the  
7 extent of the statements that have been made for which there  
8 is no evidence. How can --

9 THE COURT: I think you made your point. Let's  
10 move on.

11 MS. ANTONY: Okay.

12 BY MS. ANTONY:

13 Q You said she is very vial and viscous, and that you live in  
14 fear of your life and that you do your best to provide her  
15 with everything. Do you have any e-mails from me that speak  
16 to vial and viscous language?

17 A Yes.

18 Q Which e-mails would that be?

19 A I have it.

20 Q Have they been produced for evaluation, to the psychological  
21 evaluation and the custody evaluation, and as exhibits to the  
22 Court?

23 A I don't recall. I could still provide it, if needed.

24 Q How many such instances of e-mail writing would you have from  
25 2010 onwards that is vial and viscous in nature?

1 A Most of your e-mails were invoices, and if I don't pay  
2 invoices I get replies.

3 Q What kind of profanity is used in those e-mails?

4 A I don't want to repeat the profanity in the court.

5 MS. ANTONY: Would the Court be interested in  
6 requesting those e-mails?

7 THE COURT: The Court does not request evidence.  
8 The parties present evidence.

9 MS. ANTONY: May I make a request to request that  
10 evidence?

11 THE COURT: We are in the middle of trial. The  
12 parties may offer evidence in support of their positions and  
13 the issues in the case. I'll leave that up to the parties to  
14 decide how to do that and when to do that.

15 MS. ANTONY: The issue with the case, though, Your  
16 Honor, is there is a whole bunch of testimony and language  
17 spoken for which there are no exhibits or evidence.

18 THE COURT: Well, I believe that is an argument you  
19 may wish to make at some point. Right now we're in the  
20 middle of cross-examination. So let's move on.

21 BY MS. ANTONY:

22 Q Did you ever speak to any kind of psychiatrist, wondering why  
23 she is ill inside of the house and not outside?

24 A No doctor would talk to me regarding another patient.

25 Q Have you just gone and spoken -- you said you went to NAMI,

1 National Alliance of Mental Health Institute, or something  
2 like that. What kind of sessions did you attend there?

3 A It's a NAMI support group for families whose members are  
4 suffering from some kind of mental illness.

5 Q What kind of discussions, if any, did you have?

6 MS. MILLER: Objection, Your Honor, relevance.

7 THE COURT: Sustained. This is not relevant.

8 MS. ANTONY: Is it not relevant as to the fear --

9 THE COURT: I've ruled on the motion. Let's move  
10 on.

11 MS. ANTONY: It's very interested, Your Honor, that  
12 you allow testimony to be allowed in reports for which there  
13 is not one single concrete piece of evidence. Thank you,  
14 though.

15 THE COURT: Ms. Antony, I'm going to strike that  
16 from the record because that is not proper cross-examination.  
17 That is simply argument.

18 MS. ANTONY: It's a statement; it's not an  
19 argument. It's a statement. Thank you.

20 THE COURT: It is improper cross-examination.  
21 Let's move on.

22 MS. ANTONY: How is it improper, Your Honor?

23 BY MS. ANTONY:

24 Q When such a big amount got stolen, there is testimony from my  
25 parents as to the value of the jewelry that was presented to

1 me, sworn testimony. In light of such a big amount that got  
2 stolen, did you share any theories with the police as to who  
3 might have been responsible for stealing the jewelry?

4 A I don't follow.

5 Q Did you have any theories as to who might have stolen the  
6 jewelry, any theories at all?

7 A No.

8 Q Did the police ask any questions about --

9 A Yes.

10 Q -- what got stolen?

11 A Yes.

12 Q What kind of questions were asked?

13 A To provide a list of jewelry that was stolen and who else has  
14 access to the house.

15 Q Any kind of suspect notion as to who might have stolen?

16 A If I recall, I said they suspected the maid -- they didn't  
17 suspect, they would talk -- they would ask the maid about the  
18 theft. And they did contact the maid. And since that, I  
19 don't know.

20 Q Did it bother you that somebody knew that there was jewelry  
21 inside of the house --

22 A No.

23 Q -- of that value?

24 A No.

25 Q Did you ever ask the police as to if there were other

1 burglaries in the neighborhood?

2 A I did not ask.

3 Q Did you ever wonder if there was such a big amount ever  
4 stolen in that setting?

5 A No.

6 Q Okay. You state that, "She's in the habit of ripping  
7 electronic items off the wall and storing it in a secure  
8 facility elsewhere, in storage area elsewhere." You also  
9 state that you did not have any TV in the house for five to  
10 six months. Do you have any evidence of that?

11 A We did not have TV. I mean --

12 Q It's a statement. Do you have any evidence?

13 A No.

14 Q Do you have any evidence of any damage to the electronics?

15 A No.

16 Q Do you have any evidence of anything missing from the house,  
17 any electronic items missing from the house?

18 A No.

19 Q Are you aware that computers were not working inside the  
20 house?

21 A No.

22 Q Are you aware that she had trouble with a cell phone or any  
23 device inside of the house?

24 A No.

25 Q Are you aware that she had to actually go to FedEx to

1 actually print work in 2014 and 2015?

2 A No.

3 Q Are you aware that -- well, actually, there have been a few  
4 instances that law enforcement has been over at the house.  
5 What was the nature of those calls?

6 A There were many calls, about ten or eleven calls, mostly  
7 related to you.

8 Q Did you make those calls? Did I make those calls?

9 A You probably have made a few calls, initially, and the house  
10 was -- you were being watched and our house is getting  
11 bugged. You made a few calls in the beginning, and then I  
12 probably made a couple of calls. The kids called once  
13 because they were scared of you. And that, again, is when  
14 Child Protection Services called me up, and I met the Child  
15 Protection Services at the school because of that incident.  
16 Q You said between 2010 and 2013 the nature of the calls had  
17 dealt more with paranoia, of being bugged or probably being  
18 stalked, or some of that, right?

19 A And locking up the kids in the room.

20 Q Between 2010 and 2013?

21 A You said 15, right?

22 Q No, 13?

23 A Yes, that's right.

24 Q Post 2013, the nature of calls had to do with locking the  
25 children up in the room?

1 A One of the calls.

2 Q What about the others?

3 A Others were also related to your behavior.

4 Q Okay. Who initiated those calls?

5 A I did.

6 Q What happened when law enforcement came over?

7 A In 2014, when they came over, they took you away.

8 Q What was the reason -- what did you say? Was it just because  
9 I locked myself in the room? What was the nature of the  
10 call?

11 A You didn't lock yourself. You had the kids inside, and the  
12 kids were trying to get out of the room, and you were shoving  
13 them back to the bed.

14 Q I was shoving them?

15 A Yes, I could hear you saying -- telling the kids that,  
16 "Spending time with your papa is not your right. It's a  
17 privilege. So live with that."

18 Q Okay.

19 A And they were crying inside. They wanting to get out of the  
20 house and I was worried of you locking them in that room. So  
21 I had to call 911 just to get you out of the room.

22 Q So I shoved the kids to the bed, and that precipitated me  
23 being part in an institution for how long?

24 A You were taken away, and then you were back on -- in seven  
25 days, I guess.

1 Q Seven days?

2 A Five, plus three days in the weekend. So seven days I think.

3 Q So, basically, raising your hands on the children does  
4 require police involvement right away and that  
5 institutionalization, given that I'm mentally ill, right?

6 So five years I take the children to activities; I  
7 probably didn't shove them then.

8 A I wouldn't know that.

9 Q Okay. 2012, when I was committed, was I given attorney  
10 representation?

11 A Yes.

12 Q Were you aware of any kind of cross-examination by the  
13 attorney?

14 A My attorney did. I don't know about your attorney.

15 Q Were you present at the time?

16 A Yes.

17 Q Did you see any?

18 A I was on the stand.

19 Q You were cross-examined?

20 A I was on the stand.

21 Q What does that mean?

22 A I was asked to come as a witness.

23 Q Okay. And state your testimony?

24 THE COURT: So I'm going to intervene here because  
25 this is not relevant testimony to the issues in this divorce

1 case. This is -- these questions arise out of a different  
2 legal proceeding, and we are not here on that proceeding.

3 MS. ANTONY: It is --

4 THE COURT: We are here to -- the Court is  
5 interested in receiving evidence on the issues in this  
6 divorce case. What happened at an earlier legal proceeding  
7 is not relevant.

8 MS. ANTONY: Her paperwork is relevant to the  
9 divorce proceeding from 2012.

10 THE COURT: Well, these may be questions you wish  
11 to ask of the custody evaluator, but we are not going to  
12 continue this line of questioning right now.

13 BY MS. ANTONY:

14 Q You said that she was forced neuroleptics?

15 A What?

16 Q You stated that she was offered a choice --

17 MS. MILLER: Objection, Your Honor.

18 MS. ANTONY: That is his testimony, Your Honor.

19 MS. MILLER: This is on the subject of the  
20 commitment, and I think we've already decided that those  
21 questions are irrelevant.

22 MS. ANTONY: But that was his testimony on the  
23 stand.

24 THE COURT: His testimony on the stand was  
25 explaining the history of what led up to his decision to file

1 for a divorce and his position on child custody. We are not  
2 here to relitigate the 2012 commitment proceeding. So  
3 questions that seek to do that are not relevant.

4 So the objection is sustained.

5 MS. ANTONY: His testimony does not need to be  
6 cross-examined? There is a false statement, in my opinion.  
7 There is a Jarvis Order necessitating nueroleptics.

8 THE COURT: I've ruled on the objection. We are  
9 not going to discuss the 2012 commitment, except as a basis  
10 for his decision to file for a dissolution.

11 Let's move on.

12 MS. ANTONY: It's a false statement, when you have  
13 evidence of a Jarvis order necessitating neuroleptics.

14 BY MS. ANTONY:

15 Q Were all accounts in the household joint between 2010 and  
16 2012?

17 A Say that again.

18 Q Were all accounts in the household joint between 2010 and  
19 2012?

20 A No.

21 Q Was there a joint savings account at all?

22 A Yes.

23 Q What other accounts existed between 2010 and 2012?

24 A I think I had a checking account and you had a checking  
25 account, and one joint account.

1 Q Post 2013, what was the situation like?

2 A Same thing.

3 Q There were joint savings accounts?

4 A Yes.

5 Q Have you submitted evidence for that?

6 A Yes.

7 Q Joint savings account?

8 A Yeah, but you made it a single account when you transferred  
9 all the money from the joint account to your account.

10 Q Agreed. I did shut down the savings account.

11 A Since then, there is no joint account.

12 Q Agreed. So there has not been any kind of joint account  
13 beginning -- starting 2013. Is that true?

14 A 2014.

15 Q 2014. Okay. Is that true?

16 A Yeah.

17 Q What was the amount that I shut down the account with?

18 A Between 12 to \$15,000.

19 Q Okay. Did you have sole access to the corporation after?

20 A Yes.

21 Q Did she have any access or any insight into what you earned?

22 A I filed the taxes.

23 Q Beginning -- she did have -- she was maintaining registers  
24 between 2010 and 2012. Did she have any access or any

25 insight into what funds were in the house?

1 A I filed the taxes. That is funding the house.

2 Q Do you send her a copy of the taxes?

3 A It's on the computer, as I said.

4 Q Do you have evidence of the fact that you send her an annual  
5 tax return or --

6 MS. MILLER: Objection, Your Honor. Ms. Antony is  
7 requesting evidence from the witness, not clarifying his  
8 testimony. If she has a case to make, she can make it when  
9 she is presenting her case in chief. This is not relevant.

10 MS. ANTONY: It is relevant to financial takeover  
11 in the household beginning 2014 and his testimony.

12 THE COURT: Ms. Antony, the Court has already  
13 received tax returns into evidence, and we received evidence  
14 about Mr. Raghavan's income. If you wish to challenge that  
15 evidence, you may do so through cross-examination. But the  
16 time for requesting discovery and reviewing discovery has  
17 passed in this case.

18 So the cross-examination should be relevant to the  
19 witness's testimony and the evidence in the case thus far.  
20 I'm not sure what the relevance is of testimony about a  
21 financial takeover. I'm not sure what that means, and I'm  
22 not sure how that is relevant to the issues in this case.

23 MS. ANTONY: Mr. Raghavan made a statement that he  
24 gives his wife everything that he needs -- that she needs,  
25 "She is very viscous and vial," and he does his best to

1 accommodate her needs when she has no insight into what funds  
2 are in the household.

3 THE COURT: Ask questions about that then.

4 MS. ANTONY: That is kind of what I asked, "Did she  
5 have any insight? Did she even know what kind of money was  
6 in the house in" --

7 THE COURT: Well, just ask that question then.

8 BY MS. ANTONY:

9 Q Was she aware of how much you earned?

10 A No.

11 Q You said that she has very irresponsible spending habits?

12 A Yes.

13 Q Do you know what she buys, fancy jewelry, fancy cars, fancy  
14 equipment? What does she spend her money on?

15 A I received an invoice of \$7,000 a month after paying --

16 THE COURT: I'm sorry, sir, can you say that again?

17 I think we need to take recess here. So we'll recess  
18 and then we'll resume testimony at 3:00 o'clock.

19 MS. MILLER: Thank you, Your Honor.

20 (WHEREUPON, a recess was had,  
21 after which the following  
22 proceedings were had:)

23 THE COURT: When we recessed, Mr. Raghavan was on  
24 the witness stand for cross-examination. And we will pick up  
25 where we left off.

1 I will turn back to you, Ms. Antony, for further  
2 questions.

3 BY MS. ANTONY:

4 Q Between 2010 and 2013, before she shut down the savings  
5 account with a 12 grand balance remaining in it, are you  
6 aware of any other misuse of funds?

7 A Since?

8 Q Between 2010 -- 2013, she shut an account down, a joint  
9 savings account down, that had a balance of 12 grand in it.

10 After savings were grown to 40 grand before she got committed  
11 and after she contributed 66 grand of her earnings, she shut  
12 an account down with a balance of 12 grand in 2014. Were you  
13 aware of any misuse of funds between 2010 and 2014, where she  
14 stole, she transferred money?

15 A No.

16 Q She did something with it?

17 A You already transferred the money, so.

18 Q The 12 grand. Was there any other misuse of funds between  
19 2010 and 2013?

20 A No.

21 Q You said -- you stated she has very irresponsible spending  
22 habits?

23 A Yes.

24 Q Is there -- do you have any evidence of where she spends that  
25 money?

1 A You send me an invoice every month.

2 Q You live in the same household. What did she bring home,  
3 fancy clothes, fancy watches, fancy jewelry, fancy shoes?  
4 What does she bring home?

5 A You send me an invoice, you can look it up in the invoice  
6 what it is. I don't -- there are some items. \$7,000 monthly  
7 invoice is a lot of money.

8 Q And there is just nothing she brings home?

9 A You just state gas of \$600. Well, it's gone. Miscellaneous,  
10 \$500. I don't know what that is.

11 Q Okay.

12 A \$7,000. I don't what that is, clothing. I don't keep track  
13 of what clothes you buy, but I do keep track of what clothes  
14 I bought for the kids.

15 Q You look in the girls' closet for the kids, but you don't see  
16 anything fancy and expensive in my closet?

17 A Yes.

18 Q It's a joint closet. You don't see anything fancy and  
19 expensive?

20 A There is new stuff coming in the closet which the kids hate  
21 to wear because it's usually tight, and you don't take them  
22 shopping with you, and you will buy what you want and then  
23 they have to fit into that clothes just because you want them  
24 to. And they have come to me saying, "Papa, these clothes  
25 are really tight. Why is mama buying this because we don't

1 want to wear it." That includes shoes, that includes dresses  
2 for Christmas, Easter, whatever.

3 So you're spending all this stuff without even asking  
4 the kids whether they clearly love to wear it or not. And  
5 you're sending invoices of \$500, \$600 a month for clothing.  
6 I would appreciate if you had got the stuff for the kids,  
7 what they want to wear.

8 Q In your opinion, I spend 500 to \$600 a month on clothing  
9 alone?

10 A Yeah. There are voices, wide range of stuff. I don't know  
11 what personal, thousand dollars means, but okay. There are  
12 education, \$1200. I don't know when your kids are going to a  
13 public school, why do you need 1200 a month for education?

14 Q Every month?

15 A No. I as I said, there are wide ranges of invoices. I would  
16 question, what is \$1200 for education, because there is no  
17 communication between us. If I come and ask, the standard,  
18 canned response is, "You don't have to know. That is none of  
19 your problem."

20 Q Do I invoice you seven grand every month?

21 A No. One of the months was \$7,000; one was five;  
22 3,500; one 4,800, after having paid every living expense of  
23 the house.

24 Q Were you provided a set of all credit card statements? The  
25 custody evaluation was provided a set of all credit card

1 statements for a balance of ten grand, and you were asked to  
2 analyze those transactions and call out irresponsible  
3 spending and compare it to past expenses to see where she was  
4 spending the money?

5 A Who called?

6 Q You just stated that my spending is very irresponsible, there  
7 is ten grand, and the custody evaluation was provided with an  
8 entire year's worth of credit card statements and was asked  
9 to work with you to figure out what transactions were deemed  
10 irresponsible. Were you asked --

11 MS. MILLER: Objection, Your Honor. Ms. Antony is  
12 arguing with the witness.

13 THE COURT: So, Ms. Antony, you're essentially  
14 testifying here. So this has to be a question-and-answer  
15 format --

16 MS. ANTONY: I just wanted to know if he was aware  
17 the custody evaluation was provided the entirety --

18 THE COURT: Just ask that question then. The last  
19 question is -- the objection to the last question is  
20 sustained.

21 So if that is the question you want to ask, ask that  
22 question.

23 BY MS. ANTONY:

24 Q Were you provided -- were you provided the credit card  
25 statements that she provided the custody evaluation with so

1 that you could point out, to the custody evaluation, where  
2 the irresponsible spending was occurring in comparison to the  
3 expenses of the household in the past?

4 A I was not asked for anything.

5 Q You said -- you stated that you give her everything she asks  
6 for. Between 2010 and 2016, what have you provided the  
7 Respondent with?

8 A I was talking about the invoices that you have been sending.

9 Q Nothing fancy, in terms of any kind of devices or jewelry or  
10 purses or clothes?

11 MS. MILLER: Your Honor, I'm having trouble  
12 hearing.

13 THE COURT: I am, as well. You will have to speak  
14 up, Ms. Antony.

15 MS. ANTONY: Okay.

16 BY MS. ANTONY:

17 Q No fancy gifts -- no fancy demands, no fancy gifts.  
18 Demanding fancy jewelry, demanding fancy clothes?

19 A What is the question here?

20 Q You said you give me everything she asks for because, if you  
21 don't give me everything I ask for, your testimony is that  
22 she is so viscous and so vial and so abusive that you live in  
23 fear of your life from her. And if you don't give --

24 MS. MILLER: Objection, Your Honor.

25 MS. ANTONY: This is his testimony in the custody

1 evaluator's report.

2 THE COURT: Okay. But that is not his testimony  
3 today. So you need to be clear. That is not what he  
4 testified to today.

5 MS. ANTONY: Your Honor --

6 THE COURT: So sustained as not reflecting today's  
7 testimony.

8 MS. ANTONY: Your Honor, the custody evaluator's  
9 report, after ten months, was made available to me three  
10 weeks ago.

11 THE COURT: Ms. Antony, I'm just asking you to  
12 clarify your questions and be specific.

13 MS. ANTONY: I understand, Your Honor. For the  
14 last -- they became available to me after ten months. The  
15 trial was scheduled three weeks after the report became  
16 available. I requested time so that written interrogatories  
17 maybe put on the table so that some of this discomfort could  
18 be avoided and exhibits could be solicited and could be  
19 presented to the Court in an organized manner.

20 THE COURT: Again, Ms. Antony, the time now is for  
21 cross-examination, not to argue with the Court about  
22 procedural issues --

23 MS. ANTONY: I had no opportunity to discover any  
24 of the testimony.

25 THE COURT: Do not talk over me.

1 MS. ANTONY: My apologies.

2 THE COURT: This is your opportunity to  
3 cross-examine Mr. Raghavan. If you wish to do that, please  
4 go ahead.

5 MS. ANTONY: There is just no opportunity to  
6 discover any of the testimony in the evaluator's report.  
7 Does he get to state it all, and there's no opportunity to  
8 discover?

9 THE COURT: If you do not wish to continue  
10 cross-examination, we will move on.

11 BY MS. ANTONY:

12 Q Does she drive a run-down BMW X3 between 2010 and 2012?

13 A Run down, I don't follow.

14 Q Was the BMW X3 the old car in the household?

15 A No. It was actually the new one because the earlier car you  
16 had damaged driving into a laundry, if you have forgotten  
17 that, and then we bought a similar car which is actually one  
18 year later model.

19 Q I'm sorry?

20 A The car I was driving was a 2008 BMW. You were driving a

21 2004 BMW X3. You had an accident with the car, where you  
22 actually drove into a laundry mat. And then that was  
23 replaced with a newer 2005 X3 because I got the car at the  
24 same price the old car was totaled for.

25 Q That is the end of 2014?

1 A I'm talking about the BMW X3, 2005 model, the blue one that  
2 you drove. That's the run down version you're talking about,  
3 right?

4 Q Right. That was replaced with the Toyota RAV4 in 2014?

5 A That's right.

6 Q Between 2010 and 2012, was she driving the older car in the  
7 house?

8 A Yes.

9 Q Did she originally have -- did she originally drive the X5  
10 and hand you over the X5?

11 A Yes.

12 Q When she quit her job, was the mortgage refinanced?

13 A No. You stopped the mortgage refinancing, if you don't  
14 remember.

15 Q Was the mortgage prior to 2000 a 15-year mortgage?

16 A No.

17 Q Prior to 2010?

18 A No. It was never a 15-year mortgage; it's always been a  
19 30-year. We were going to refinance for 15 years, but you  
20 quit the job and walked into the house and said, "Stop  
21 refinancing, I'm quitting the job," and we stopped right  
22 there, and it's still a 30-year mortgage.

23 Q So, actually, mortgage payments did not come down in the  
24 household?

25 A I don't recall, but it's pretty much the same.

1 Q Okay.

2 A It probably increased.

3 Q Were insurance plans refinanced, medical insurance plans?

4 A Yes. I have to have medical insurance every year. Because  
5 of the insurance premiums going high, I have to shop for new  
6 insurance.

7 Q In 2010, did any medical insurance come down?

8 A 2010, no.

9 Q No insurance payments came down in 2010?

10 A In fact, it increased.

11 Q It increased. Okay. Were cars paid off in the household?

12 A No.

13 Q No. Was the X3 -- was the X3 not paid out at all?

14 A The first one. The second one, as I said, we -- I just used  
15 that money to buy the next model, and the X5 still had the  
16 loan on it for awhile, if I remember. I don't know exactly  
17 whether it was paid off, but it had a loan for awhile.

18 Q So, in your opinion, as per your statement, you state that  
19 the X3 got paid out?

20 A The first one.

21 Q Did it stay paid out?

22 A Yes.

23 Q There was not a new car bought until the accident in 2014  
24 then?

25 A Accident happened in 2010 of September. That is when you

1 rammed the car into the laundry mat. I'm sorry I'm repeating  
2 again, but she rammed the car into the laundry mat. And the  
3 same month I bought another 2005 BMW X3, the same model, just  
4 one year later model, and you were using that. And then the  
5 BMW 2005 X5, I was still paying the loan for awhile. I don't  
6 know how many years was left. And then we got a new car in  
7 2014 of November. And I got another one in 2015 October.

8 Q So 2010, a car was replaced because I had an accident in  
9 2010?

10 A Yes.

11 Q And in 2014 a brand new car was bought?

12 A Yes.

13 Q Why did we need a brand new car in 2014?

14 A Because --

15 MS. MILLER: Your Honor, I object to a relevance  
16 issue.

17 THE COURT: Sustained. This is not relevant.

18 What is relevant is the property that exists at the time  
19 of the divorce, and how it should be divided.

20 MS. ANTONY: Is --

21 THE COURT: So sustained as irrelevant.

22 MS. ANTONY: It is relevant to the trial in terms  
23 of there are allegations that she quit her job irresponsibly  
24 and she does irresponsible spending, for which there is no  
25 evidence, again. So it's relevant from that standpoint.

1 THE COURT: I've ruled on the objection.

2 BY MS. ANTONY:

3 Q How many crashes between 2010 and 2015?

4 A What does that mean?

5 Q How many car crashes?

6 A By whom?

7 Q Any.

8 A 2010 and 2015, the one crash that we had to total the car,

9 and quite a few accidents like the side of the car, the

10 fender bender, there were three or four, if I remember.

11 Q When was that?

12 A 2014 sometime. Right now the car is still damaged.

13 Q Between 2010 and 2014 or 15, do you recall any other crashes

14 besides the car you claim that got replaced?

15 A So there were a few fender benders, as well, I'm saying.

16 Q Between 2010 and 2015?

17 A Yeah.

18 Q Is there any evidence for that?

19 A We have insurance payment.

20 MS. MILLER: Objection, Your Honor. Testimony is

21 evidence.

22 THE COURT: It's a true statement. I'm not sure  
23 what the objection is. I think we should just move on.

24 MS. MILLER: It's argumentative.

25 THE COURT: I think we should just move on.

1 MS. ANTONY: I think there should be a request for  
2 discovery. There is no request for any of these exhibits to  
3 be presented to the Court.

4 THE COURT: As I indicated before, this is your  
5 opportunity to cross-examine the witness. Please go ahead  
6 with that.

7 MS. ANTONY: If I don't have an opportunity to  
8 request those exhibits, I don't have an opportunity to  
9 counter those exhibits?

10 THE COURT: Well, this matter has been pending for  
11 over a year. You've had ample opportunity to request  
12 whatever discovery you wanted. So let's move on.

13 MS. ANTONY: I didn't have an opportunity to see  
14 the evaluation report until three weeks ago, ma'am.

15 THE COURT: I'm not sure traffic tickets and fender  
16 benders are relevant to the issue of custody.

17 MS. ANTONY: It's relevant to my mental health.

18 THE COURT: Possibly. Let's move on.

19 BY MS. ANTONY:

20 Q You stated in your testimony that you had incredible amounts  
21 of expenses because I refused the furniture from the  
22 household?

23 A I didn't say incredible. I had expenditures.

24 Q An amount of?

25 A I think -- I don't remember the exact amount, but I think

1 that is in the evidence, right?

2 MS. MILLER: Exhibit 11.

3 THE COURT: Is there a question.

4 MS. ANTONY: The amount of Exhibit 11 was?

5 MS. MILLER: \$8,371.11.

6 BY MS. ANTONY:

7 Q The ex parte says five years of mental illness, where the  
8 children are terrified of me for five years straight; is that  
9 true?

10 A Yes.

11 Q Did you have five years to plan for the ex parte order and  
12 what it would take to set up a household?

13 A I was not planning for the ex parte or the divorce.

14 Q Were you not terrified?

15 THE COURT: Excuse me. Let's make sure the record  
16 is clear. The Court did not issue an ex parte order. The  
17 Court issued an Order for Temporary Relief.

18 MS. ANTONY: There was an ex parte prior to the  
19 temporary order, where children were asked to leave. I  
20 agree, when you were the judge appointed, that the only order  
21 that got issued is the Temporary Order.

22 THE COURT: Thank you. Let's be clear. That is  
23 the order that is in effect right now. Let's be clear about  
24 that.

25 MS. ANTONY: The statement is that he had to spend

1           \$8,000 because I refused furniture from the house.

2                       THE COURT: You may ask him questions about that,  
3 if you wish. Do you have questions for him about those  
4 expenses?

5 BY MS. ANTONY:

6 Q Did you have five years to set up a household?

7 A Five years for -- I'm not following.

8 Q Five years of terror and threat. You finally had to go find  
9 relief and ask for an order so that you could take the  
10 children outside of the household?

11 A As I said, I didn't plan for a divorce.

12 Q Why would you not -- for five years you have been living in  
13 terror and threat. The childrens' lives are in danger --

14                       MS. MILLER: Objection, Your Honor, that's  
15 argumentative.

16                       THE COURT: It is. Sustained.

17                       MS. ANTONY: Why is it argumentative, Your Honor?

18                       THE COURT: I sustained the objection. Let's move  
19 on.

20 BY MS. ANTONY:

21 Q Did you have to spend eight grand only because I refused  
22 furniture? What was your plan -- if you needed to take the  
23 children outside of the house, how would the children live?

24 A I did not plan for anything. First two months, I stayed in a  
25 friend's house, and then I moved to an apartment. And I

1           hoped that you, as a mother, would look at the kids and give  
2           them what they want, but you did not.

3   Q       Did you have parents visiting from abroad?

4   A       From India, yes.

5   Q       Did you need parental support to raise the children?

6   A       Parental support? I don't understand.

7   Q       Support from your parents to raise the children?

8   A       I didn't need them to raise my kids. I just call them over  
9           for a vacation.

10  Q       Is it true that you spent roughly an amount of about three to  
11           six grand, 3,000 in tickets alone?

12  A       \$1895, two tickets.

13  Q       Did you have vacations with them?

14  A       No.

15  Q       Didn't go to Chicago? Didn't go for summer vacations?

16  A       No.

17  Q       Cabin trips?

18  A       No.

19  Q       If I state the children stated that, would they be lying?

20  A       Yes. We went, I and the kids, but not with the parents.

21  Q       So incredible expenses with having to furnish your house that  
22           you probably needed to do anyway to take the children away;  
23           parents from abroad, about six grand worth of expenses?

24  A       Six grand -- \$1895 for two tickets, again. It's not \$6,000.

25  Q       And vacation expenses?

1 A \$795 to go to Chicago for three tickets; that's it. I stayed  
2 at my friend's house. Not a single dollar from my account.

3 Q No cabin trips?

4 A Yeah, probably \$200 for a cabin trip.

5 Q Okay. Did you have plenty of -- I suppose it wouldn't be  
6 relevant to your testimony. I'll keep moving on.

7 We purchased two dogs in the household after I returned  
8 from my committal in 2012, correct?

9 A Yes.

10 Q Was I on medication when we purchased the dogs?

11 A Yes.

12 Q Did we purchase two of them?

13 A Originally, we purchased one, but you forced me to purchase  
14 the second one.

15 Q I forced you to?

16 A Yes.

17 Q So we purchased two dogs when I'm mentally ill. I'm not able  
18 to take care of the children; we have two dogs in the  
19 household. Did the two dogs get trained?

20 A You did not let them be trained.

21 Q I did not want them to be trained?

22 A Yes.

23 Q So I'm mentally ill; I'm not capable of taking care of  
24 children; I insist on purchasing two dogs; I do not want for  
25 them to be trained; and I want to actually pick up all the

1 poop and puke and pee off the floor?

2 MS. MILLER: Objection, Your Honor, relevance.

3 THE COURT: Well, it's not a question. So I'm  
4 going to sustain the objection.

5 MS. ANTONY: Did --

6 THE COURT: If you have a question, you need to ask  
7 it as a question.

8 BY MS. ANTONY:

9 Q In your opinion, do you think I wanted to clean the poop and  
10 pee and puke off the floor, for a mentally ill woman?

11 A I think you three decided to get the dogs. I don't know your  
12 mental state, what you're thinking when you're asking to  
13 purchase dogs.

14 Q Do you think it's common practice to want to train dogs after  
15 you buy dogs?

16 A I tried to do that, but you did not let me.

17 Q So you were so intimidated by me that you would not actually  
18 even try to train the dogs?

19 A I was not intimidated when you came back from the hospital.

20 I think I already mentioned that you were on medication  
21 and things were getting better. And that is the time when  
22 you bought the dogs. And the household seemed to be much  
23 happier because you were nicer. And that is when we bought  
24 the dogs.

25 And I tried to train the dogs with the food, with

1        littering, everything, but you did not want that to happen  
2        because you want to raise the dog as you would in India,  
3        which is a totally different deal.

4    Q    So, at my insistence, you did not train the dogs, and you  
5        were not concerned because I'm so mentally ill I probably am  
6        overwhelmed by the sensory smell. You're not concerned that  
7        I'm kind of cleaning -- did you ever clean all of the litter  
8        off the floor?

9    A    Yes.

10   Q    You did. During the day -- are you at home during the day?

11   A    No.

12   Q    Did you ever take time off between 2010 and 2015?

13   A    Yeah, we went to Dubai, went to India, went to Jamaica, we  
14        went to Las Vegas, and we went to California.

15   Q    Went to Jamaica?

16   A    Yeah, we went to Jamaica. Yeah, we did.

17   Q    I --

18   A    We went to California, we went to Hawaii -- Alaska. Go on.

19   Q    We went to California which year?

20   A    In 2012, your sister and your mother were here, your mom and  
21        dad. We all went to California.

22   Q    Were there episodes on the vacation trip with family?

23   A    At that time, you had come back from the hospital and you  
24        were doing good.

25   Q    Were there other vacations between 2010 and 2015?

1 A I think we went to Hawaii -- I'm sorry, it's Alaska. We went  
2 to Alaska with your sister.

3 Q Were there episodes on that trip?

4 A No episodes, but your brother-in-law asked me what is going  
5 on with you again, and "Is she, again, having the same  
6 symptoms that she had before," and I said, "Yes. It's been  
7 going on for the past year and a half, or so. After she came  
8 back from the hospital and she was on medication. After she  
9 stopped the medication, it happened again." So he observed  
10 it, and he asked me many times, "What is going on?"

11 Q So did both Alaska and California happen in 2012?

12 A One was -- I think one was in 2012 and one was in 2013, I  
13 think.

14 Q So there were two trips from family, back to back, after I  
15 returned from the institution?

16 A Yes.

17 Q And I did better for an entire year, where I did not scream  
18 inside the house for an entire year?

19 A I never said that.

20 Q But I screamed inside house, but did not scream on vacation?

21 A Yes, you did. You were screaming in the room, and we had to  
22 step out of the room early because there were other people  
23 staying in the hotel. So we had to rush out because you were  
24 getting in the bathroom and started screaming, and I and the  
25 kids were -- I said, "I can't handle this."

1 Q Were there any concerns from hotel folks?

2 A Not that I know of.

3 Q No concerns. They didn't see me screaming profanity.

4 So you did not attempt to train the dogs because you  
5 were intimidated by me and did not try to train the dogs at  
6 my insistence?

7 A I never said intimidated. I said you did not allow me to do  
8 it because you had a certain way of training the dogs, and I  
9 just let it happen, given the fact that our life was in such  
10 a bad situation until you took the medication and came back.  
11 So I did not want any kind of volatility in the house,  
12 especially for the girls. I just let you do what you wanted  
13 to do, so that the household can be at peace.

14 Q Interesting. Why did you choose to live in the house for six  
15 and a half years, to live with a woman screaming and laughing  
16 hysterically every single day?

17 THE COURT: I'm going to intervene here. This is  
18 argumentative. It's not relevant.

19 MS. ANTONY: It's relevant to his testimony that  
20 it's part of his culture, when the children are in grave  
21 danger.

22 THE COURT: It's not relevant. Move on.

23 MS. ANTONY: What is relevant, Your Honor? His  
24 testimony ain't relevant?

25 THE COURT: Relevant testimony is -- relevant

1 evidence is evidence which tends to prove or disprove any  
2 material elements or facts or issues in the litigation.

3 Here, we are dealing with issues of spousal maintenance,  
4 child custody, child parenting time, and the division of  
5 property.

6 I've heard quite a bit about the history of the parties'  
7 marriage and what led up to filing the Petition for divorce.  
8 What I need to hear about is how the parties' property should  
9 be divided; what the property is; what it's worth; how it  
10 should be divided; how the parties should support themselves  
11 moving forward, spousal maintenance; insurance, things like  
12 that; and where the parties' children should live and how  
13 they should be supported. In other words, what is going to  
14 be in their best interests going forward. I've heard very,  
15 very little evidence about any of those issues, and it's now  
16 almost 4:00 o'clock.

17 So the parties are advised to remember that the Judge,  
18 me, the Court, needs that evidence to make good and fair  
19 decisions in this case. We can spend our three days talking  
20 about things that are not very relevant to those issues, but  
21 I would strongly suggest that we focus on the issues in this  
22 litigation, and that you provide the Court with evidence that  
23 will be helpful to the Court in deciding those issues.

24 MS. ANTONY: We've waited ten months for a custody  
25 evaluator report that decided the custody issue, and the

1 custody issue alone. Ten months, and three weeks ago. There  
2 is not enough time to figure out what the property division  
3 should be; what the rest of the assets should look like; what  
4 the rest of the division should look like. Ten months to  
5 weigh a custody evaluation on the testimony of the two best  
6 friends, the Petitioner's testimony, and two children's  
7 testimony.

8 THE COURT: I think it's important to --

9 MS. ANTONY: And there --

10 THE COURT: Ms. Antony, it's important for you to  
11 understand that the custody evaluation is evidence. It's not  
12 all the evidence.

13 A lot of the evidence comes from the parties,  
14 themselves, and their testimony. And you will have an  
15 opportunity to testify. The custody evaluation is simply one  
16 piece of evidence, and you can challenge it and can  
17 cross-examine the person who did the evaluation. And you can  
18 testify and present your own evidence. That's how it works.

19 Let's try to keep that in mind and let's move on.

20 MS. ANTONY: No more questions for now, Your Honor.

21 THE COURT: Ms. Miller, do you have any questions  
22 on redirect?

23 REDIRECT EXAMINATION

24 BY MS. MILLER:

25 Q Bijoy, do you remember preparing an affidavit that was dated

1 the 19th of December, 2015?

2 A Yes.

3 Q That is on file and of record in this proceeding; is that  
4 correct?

5 A Yes.

6 Q And, as an exhibit A at the back of that particular

7 affidavit, is a list of contacts that your family had with

8 either police or Child Protection reports; is that correct?

9 A Yes.

10 Q And those were contacts that were from people outside your  
11 home; is that correct?

12 A Yes.

13 Q And in at least two of those cases, people who witnessed Ms.  
14 Antony's conduct outside the home?

15 A Yes.

16 Q And do you wish the Court to take judicial notice of those  
17 documents?

18 A Yes.

19 MS. ANTONY: This isn't redirect, Your Honor. Were  
20 there just two cases?

21 THE COURT: I don't know. I don't have that  
22 evidence in front of me.

23 BY MS. MILLER:

24 Q Bijoy, are you saying that Ms. Antony is an incompetent  
25 person?

1 A Yes.

2 Q What is making her incompetent?

3 A Her mental illness.

4 Q Are you saying she is a bad person?

5 A No.

6 Q Are you saying you've known her historically to be competent?

7 A Yes.

8 Q And to be an appropriate parent?

9 A Yes.

10 Q Is it fairly typical that Ms. Antony does not register  
11 information or feedback about her conduct and behavior?

12 A Yes.

13 MS. MILLER: I have no further questions, Your  
14 Honor.

15 THE COURT: Ms. Antony, do you have any further  
16 questions on cross-examination as a result the questions Ms.  
17 Miller has just asked Mr. Raghavan?

18 MS. ANTONY: Yes, I do, Your Honor.

19 THE COURT: Go ahead.

20 RE CROSS-EXAMINATION

21 BY MS. ANTONY:

22 Q Are you also stating, then, even though you believe that she  
23 is a competent mother and has been a competent mother in the  
24 past, but not necessarily a competent mother since 2010  
25 courtesy of mental illness, are you also stating that you are

1 not aware of what is making her ill only inside of the house?

2 A Yes.

3 Q Ms. Miller also stated that Ms. Antony -- that there is

4 conduct or behavior reports that states that Ms. Antony does

5 not register her behavior and her conduct. Are there

6 specific examples of where she is not registering her

7 behavior and conduct besides the two reports of extreme

8 profanity in 2015, one in the auditorium of the school and at

9 church?

10 A So what is the question?

11 Q Ms. Miller stated that Ms. Antony does not register her

12 behavior and her conduct. Are there specific examples of

13 where she does not register her behavior and her conduct

14 besides the two episodes in 2015?

15 A Yeah. I think I mentioned earlier in the ice skating rink it

16 has happened, and then there was a camping trip where all our

17 families were there, and you had gone to the bathroom and you

18 started screaming. And the older kids had to take all the

19 younger kids upstairs. And they went upstairs and told their

20 moms and dads, saying that something is wrong with Simi.

21 Simi is her nickname, S-I-M-I. So, "Something is wrong with

22 Simi, Auntie." So their parents came down, and they all

23 listened to what is going on, and then they actually wanted

24 to ask me about it, but then they did not because we were on

25 a camping trip, and that was only for a day and a half.

1           And then we went back. And then a couple of parents  
2 actually called me and said, "Next time when you bring Simi  
3 over to our house, make sure her behavior is all right,  
4 otherwise she's not welcome to our house. We do not want our  
5 children exposed to her profanity." So I said, "In that  
6 case, I realize I have to stop socializing with you guys  
7 because I cannot do that. I cannot ask my wife not to come  
8 with me when we are going to a social event."

9 Q       Again, are there reports from the ice skating rink, a public  
10 place where children around?

11 A       No.

12           MS. ANTONY: That's all.

13           THE COURT: You have no other questions right now?

14           MS. ANTONY: No.

15           THE COURT: Do you have follow-up questions, Ms.  
16 Miller?

17           MS. MILLER: None, Your Honor.

18           THE COURT: So, at this point, Mr. Raghavan, you've  
19 testified, and you have been subject to cross-examination,  
20 and your attorney had a chance to follow up on some of that  
21 questioning. And Ms. Antony has had a chance to follow up,  
22 as well. So, at this point, for the time being, your  
23 testimony is concluded. So you may step down from the  
24 witness stand. Thank you.

25           THE WITNESS: Thank you.

1 THE COURT: So why don't we talk about a plan for  
2 the next day or so, since Mr. Raghavan has testified? I know  
3 you have witnesses scheduled for tomorrow morning, Ms.  
4 Miller.

5 MS. MILLER: That's correct, Your Honor.

6 THE COURT: I do have your witness and exhibit  
7 list.

8 MS. MILLER: And tomorrow afternoon, also.

9 THE COURT: Okay. I'm assuming that would be the  
10 custody evaluator, Ms. Hatcher.

11 MS. MILLER: In the morning.

12 THE COURT: Okay. And Dr. Harrington?

13 MS. MILLER: In the afternoon.

14 THE COURT: Okay.

15 MS. MILLER: I checked with Mr. Gilligan, and I was  
16 told she should come at 1:00. Should that be 1:30 instead?

17 THE COURT: No, that's fine. Typically, we recess  
18 for lunch between noon and 1:30, but that gives her a chance  
19 to get here and get settled in before we start any testimony.

20 And then, Ms. Antony, in addition to yourself, are you  
21 planning to call other witnesses?

22 MS. ANTONY: No, Your Honor.

23 THE COURT: Okay. Obviously, you have -- you will  
24 have an opportunity to cross-examine the witnesses that are  
25 called by the other side.

1           For right now, I believe this would probably be a good  
2 time to recess for the day.

3           MS. MILLER: I believe that would be appropriate,  
4 Your Honor. Thank you.

5           THE COURT: So let's do that. So court is in  
6 recess. We will plan to resume testimony at 9:00 o'clock  
7 tomorrow morning, and I believe that will be Ms. Hatcher.

8           MS. MILLER: Correct.

9           THE COURT: Okay. That is the plan. We will see  
10 everyone back here shortly before 9:00 o'clock tomorrow  
11 morning.

12           I believe this courtroom will be locked. So you may  
13 leave things in here, if you wish. Obviously, you can take  
14 them with you, if you like. But if you would prefer to leave  
15 some things here, that is fine, as well. We'll have a sign  
16 posted on the door indicating that there is a trial in  
17 progress here, and that the courtroom is locked and closed.  
18 That would include cleaning staff. So if you wish to leave  
19 things in here, you may. It is a secure location.

20           We will see you tomorrow morning. Thank you.

21                           (WHEREUPON, proceedings recessed  
22                           for the day.)

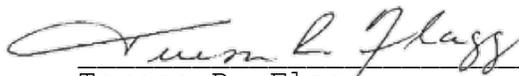
STATE OF MINNESOTA )

)

COUNTY OF SCOTT )

I, Teresa R. Flagg, do hereby certify that the above and foregoing transcript consisting of the preceding 164 pages is a full, true and complete transcript of the proceedings to the best of my ability.

Dated: December 30, 2016



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