

Witness: Vijayalakshmi Wortley
First witness statement
On behalf of: Vijayalakshmi Wortley
Exhibit: VW1
Date: 1 April 2026

IN THE CLAIM NO. BL-2026-000267
IN THE ESTATE OF KRISHNASWAMI VENKATARAMANAN
BETWEEN:

MOHINI HERSOM

Claimant

AND

VIJAYALAKSHMI WORTLEY

Defendant

EXHIBIT VW1

LAST WILL AND TESTAMENT

INTRODUCTION AND REVOCATION

This is the last Will and Testament of me Krishnaswami Venkataramanan of 19 Carston Grove, Calcot, Reading RG31 7ZN relating to my estate in England and Wales only ('my English Estate'). I hereby revoke all previous Wills and testamentary dispositions made by me in relation to my English Estate and I declare this to be my last Will relating to my English Estate. I expressly declare that I do not revoke any Wills or testamentary dispositions made by me other than in relation to my English Estate.

APPOINTMENT OF EXECUTORS AND TRUSTEES

I appoint my daughter Vijayalakshmi Wortley and my son-in-law Stephen Wortley to be the Executors of this Will.

I appoint my Executors in the clause above (hereinafter called my Trustees, which expression shall include the Trustees for the time being hereof) to be both Executors and Trustees of this my Will.

NON RESIDUARY GIFT

I give free of tax my beneficial interest in the property known as 19 Carston Grove, Calcot, Reading RG31 7ZN free of any mortgage debt or charge secured thereon to my daughter Vijayalakshmi Wortley.

RESIDUARY ESTATE

I give the residue of my estate after the payment of my debts, funeral and testamentary expenses and legacies ('my residuary estate') to be divided equally between my granddaughter Jasmine Chandini Wortley and my grandson Robin Peter Wortley SUBJECT TO the following provisions:

- (a) if either of them should die within 30 days of my death or predecease me leaving children then those children shall on attaining the age of 18 take equally the share which their parent would have taken if he or she had survived me

(b) but if either of them should die within 30 days of my death or predecease me leaving no surviving children then the share which would have passed to such deceased beneficiary shall pass to the survivor of them (or to their issue by substitution as hereinbefore provided).

FUNERAL WISHES

I wish my body to be cremated.

NON PROVISION CLAUSE

I make this Will in the knowledge that I have made no provision for my daughter Mohini Hersom for the reasons stated in a document which I have prepared and signed and is deposited with my Will.

POWERS AND RESPONSIBILITIES OF EXECUTORS AND TRUSTEES

The Standard Provisions of the Society of Trust and Estate Practitioners (Second Edition) shall apply to this Will.

IN WITNESS whereof I have hereunto set my hand

Date: 27 November 2022

Signature of Testator: K Venkataraman

[In signing I confirm that neither of my Witnesses is mentioned in this my Will nor are they married to, or the partner of, any person mentioned in this my Will]

Print Full Name: KRISHNASWAMI VENKATARAMANAN

Signed by the above Testator KRISHNASWAMI VENKATARAMANAN as and for his last Will and Testament in the presence of us both present at the same time together who then at his request and in his presence and in the presence of each other, hereunto subscribed our names as witnesses.

WITNESS ONE

Signature: [Signature]

Print Full Name: Agnes Slade

Address: 18 Carston Grove

Fords farm, Calcot

Reading RG31 72N

WITNESS TWO

Signature: [Signature]

Print Full Name: GREGORY PHILIP SLADE

Address: 18 CARSTON GROVE

FORDS FARM, CALCOT

READING RG31 72N

19 Carston Grove
Reading RG31 7ZN

To Whom It May Concern

I confirm that I have excluded my daughter Mohini Hersom from my will for the following reasons:

Mohini has not wanted to have a relationship with myself, and immediate family from the 1980s when she was at University and was suffering from mental health issues. She has consistently refused treatment.

Over the decades my wife Radha and I have tried to connect with her, build a relationship with her and stay in contact without much success. She has remained hostile and abusive and out of contact for year at a time.

She has been very clear in her efforts not to want to see us over our lifetime, even refusing to see or speak with us when my wife and I travelled from India to Arizona to see her.

Following our the move of my wife and myself to the UK in 2007, to spend a few years with our other daughter and to see our grandchildren grow up, Mohini who at this time in the UK made it clear she did not want contact with us yet again. She did visit us on a few occasions, around 5 times in 15 years, but it was usually if she needed something (such as Visa sponsorship etc.)

During this time she has continued to be abusive to family members and our neighbours, published various lies on the internet. She harassed my other daughter Viju and tried all the schools in Reading until she tracked down my granddaughter. She then created a fake email id and pretended to be Viju and arranged a meeting with the school and my granddaughter as a means of gaining access to my granddaughter. My daughter Viju had to take out an injunction against her. It would appear that Mohini in conjunction with her friend Alex signed my son in law up to various unsuitable right wing organisations using his work email address, causing my son in law issues at work. She even made a failed attempt to take out a non molestation order to prevent us making contact.

She came around with her friend Alex in 2017 and demanded £2 million, having misunderstood our financial circumstances. Alex seems to be motivated by what money he can get out of us through his friendship with Mohini, including asking Radha to give him money that he could pass on to her. This visit to demand £2 million pounds was the last time we saw Mohini. Despite pleading by Radha, Mohini cut off all contact. She did not respond to phone calls, letters or emails. My wife attempted to keep channels of communication open via the friend Alex but she never responded.

I tried to contact her through Alex in 2022 to let her know that Radha was gravely ill and again when she passed away, and Mohini did not phone, or personally get in touch about her mothers passing.

On hearing of my wife's passing, Alex has taken what I consider to be predatory interest in me, writing and calling me and even turning up on my doorstep in an effort to pretend a relationship with me in order to forge some path to getting money from me.

To this end he appears to have persuaded Mohini to get in touch with me more than a year after my wife's passing. She is clearly still hostile and has not changed her abusive behaviour. I wrote my will excluding her before she got back in touch and I stand by that decision for the reasons stated

above and will be leaving my estate to my daughter Vijayalakshmi and her children to secure their futures.

I have requested Viju at her discretion, on my passing to invest the equivalent of INR10,000,000 (which is c. £100,000) so that if needed she can pay Mohini up to £1500 / quarter subject to interest earned. This should be actioned via a solicitor and Mohini should be required to provide proof of payee and proof to show she is alive and that the funds are going to her.

Regards

Signed.....K. Venkatarame..... Date.....8 / April / 2023.....

Name.....K. VENKATARAMANAN.....

WSL

willwriting

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LAST WILL AND TESTAMENT

LAST WILL AND TESTAMENT

INTRODUCTION AND REVOCATION

This is the last Will and Testament of me Krishnaswami Venkataramanan of 19 Carston Grove, Calcot, Reading RG31 7ZN. I hereby revoke all former Wills and Codicils made by me and declare this to be my last Will.

APPOINTMENT OF EXECUTORS AND TRUSTEES

I appoint my wife Radha Venkataramanan and my daughter Vijayalakshmi Wortley and my son-in-law Stephen Wortley to be the Executors of this Will.

I appoint my Executors in the clause above (hereinafter called my Trustees, which expression shall include the Trustees for the time being hereof) to be both Executors and Trustees of this my Will.

LIFE INTEREST IN 19 CARSTON GROVE, CALCOT, READING RG31 7ZN (‘PROPERTY PROTECTION TRUST’)

In this clause:

- (a) “the Life Tenant” shall mean my wife Radha Venkataramanan.
- (b) “my Trustees” shall mean my Trustees for the time being and the powers given by this clause are without prejudice to any other powers given by this Will or any codicil to it or by the general law and are exercisable even though my Executors and Trustees may be the same persons and my wife may be among them and any of my Trustees may exercise or concur in exercising all powers and discretions given to him or her by this clause or by law notwithstanding that he or she has a direct or other personal interest in the mode or result of any such exercise.
- (c) “the Trust Period” shall mean the period between my death and the death of the Life Tenant.

- (d) "the Trust Fund" shall mean my beneficial interest in the property known as 19 Carston Grove, Calcot, Reading RG31 7ZN free of any mortgage debt or charge secured thereon with the furniture carpets curtains and other articles of household use or ornament therein not otherwise specifically gifted by this Will or any codicil.
- (e) "interest in possession" shall have the same meaning it has for the purposes of the Inheritance Tax Act 1984 (or any statutory provision which amends or replaces it and which is in force at my death or thereafter).

If the Life Tenant shall survive me then I give the Trust Fund to my Trustees to hold upon the following trusts:

- (1) My Trustees shall pay the income of the Trust Fund to the Life Tenant for the Trust period.
- (2) My Trustees may at any time or times during the Trust Period as to the whole or any part of the Trust Fund in which the Life Tenant has for the time being an interest in possession:
 - (i) lend money or assets comprised in the Trust Fund to the Life Tenant on such terms (whether including provision for the payment of interest) as my Trustees think fit;
 - (ii) pay out of the proceeds of this property or any substituted property (purchased as a result of this sub-clause) to purchase a freehold or leasehold property which will be held for the benefit of the Life Tenant on the same trusts to which this clause refers.
- (3) I declare that in exercising the powers conferred upon my Trustees in clause (2) above my Trustees shall be entitled to have regard solely to the interests of the Life Tenant and to disregard all other interests or potential interest under my Will.
- (4) Subject as above my Trustees shall permit the Life Tenant to occupy or use rent free any property or assets or the beneficial interest therein which is for the time being comprised in the Trust Fund subject to those conditions for the payment of outgoings, insurance, repair, decoration and other matters as my Trustees shall from time to time consider reasonable.

- (5) Subject as above my Trustees shall hold the capital and income of the Trust Fund for my daughter Vijayalakshmi Wortley shall she be living at the end of the trust and if she shall fail to obtain a vested interest then my grandchild Jasmine Wortley and my grandchild Robin Wortley shall take by substitution and if more than one then in equal shares.

NON RESIDUARY GIFT

If my wife fails to survive me then I give and bequeath free of tax my beneficial interest in the property known as 19 Carston Grove, Calcot, Reading RG31 7ZN free of any mortgage debt or charge secured thereon to my daughter Vijayalakshmi Wortley PROVIDED THAT if she should die within 30 days of my death or predecease me then my grandchild Jasmine Wortley and my grandchild Robin Wortley shall on attaining the age of 18 take equally the share which their parent would have taken if she had survived me.

RESIDUARY ESTATE

I give the residue of my estate after the payment of my debts, funeral and testamentary expenses and legacies ('my residuary estate') to my wife Radha Venkataramanan.

If my wife fails to survive me or if the gift to my wife fails for any other reason then I give my residuary estate on the following Discretionary Trust:

- (1) In this clause:
 - (a) 'the Trust Fund' means my residuary estate.
 - (b) 'my Beneficiaries' are my daughter Mohini Hersom and my daughter Vijayalakshmi Wortley and my grandchild Jasmine Wortley and my grandchild Robin Wortley.
- (2) My Trustees shall hold the Trust Fund upon the following trusts:
 - (a) For not more than 125 years from my death to apply the capital of the Trust Fund for the benefit of such of my Beneficiaries as my Trustees think fit.
 - (b) To apply the income of the Trust Fund for the benefit of such of my Beneficiaries as my Trustees think fit or to accumulate the whole or any part of it.

- (c) Within 125 years of my death to end these trusts by distributing the Trust Fund among such of my Beneficiaries as my Trustees think fit.
 - (d) To exercise their discretionary powers over capital or income when and how they think fit without having to make payments to or for the benefit of all my Beneficiaries or to ensure equality among those who have benefited.
- (3) My Trustees shall have the following powers:
- (a) To retain or sell any of the assets constituting the Trust Fund;
 - (b) To invest as if they were beneficially entitled and this power includes the right to invest:
 - (i) in unsecured interest free loans to any Beneficiary;
 - (ii) in non-income producing assets including policies of life assurance (with power to pay premiums out of income or capital);
 - (iii) in property for the occupation of any Beneficiary;
 - (c) To use the income or capital of the Trust Fund for or towards the cost of maintaining or improving any property forming part of the Trust Fund;
 - (d) To make loans which may be interest free;
 - (e) To borrow money on such terms as they think fit (including the giving of security) and to use it for any purpose for which the capital of the Trust Fund may be used;
 - (f) In exercising the statutory power of appointing new trustees to appoint a professional person and give him the right to charge for work done by himself or his firm.

FUNERAL WISHES

I wish my body to be cremated.

POWERS AND RESPONSIBILITIES OF EXECUTORS AND TRUSTEES

The Standard Provisions of the Society of Trust and Estate Practitioners (Second Edition) shall apply to this Will and the Trusts created under it.

Office Reference: 52523286

IN WITNESS whereof I have hereunto set my hand

Date: 9 July 2021

Signature of Testator: K Venkataramanan

[In signing I confirm that neither of my Witnesses is mentioned in this my Will nor are they married to, or the partner of, any person mentioned in this my Will]

Print Full Name: KRISHNASWAMI VENKATARAMANAN

Signed by the above Testator KRISHNASWAMI VENKATARAMANAN as and for his last Will and Testament in the presence of us both present at the same time together who then at his request and in his presence and in the presence of each other, hereunto subscribed our names as witnesses.

WITNESS ONE

Signature: Agnes Slade

Print Full Name: AGNES SLADE

Address: 18 CARLTON GROVE

FORDS FARM, CALCOT

READING. RG31 7ZN

WITNESS TWO

Signature: Gregory Philip Slade

Print Full Name: GREGORY PHILIP SLADE

Address: 18 CARLTON GROVE

FORDS FARM. CALCOT

READING RG31 7ZN