

On behalf of the Claimant
Witness: Mohini Hersom
Dated: 08/05/2026

IN THE HIGH COURT AT CENTRAL LONDON
BETWEEN:

Claim No: BL-2026-000267

MOHINI HERSOM

Claimant

-and-

VIJAYALAKSHMI WORTLEY

Defendant

2nd WITNESS STATEMENT OF MOHINI HERSOM

I, Mohini Hersom residing at Room 303, 95-98 Talbot street, Dublin 1, D01 WR94, will say as follows:

1. I am the Claimant in these proceedings and the daughter of the Deceased Krishnaswami Venkataramanan who died on 01 August 2024.
2. I make this statement in support of my application for an order that the Defendant pay the costs of these proceedings.
3. The facts stated in this witness statement are matters within my own knowledge and belief and are true or are based on the information provided to me, in which case I will state the source of that information and I confirm that the information is true to the best of my knowledge and belief.

4. I can confirm that this statement has been prepared by me.
5. I make this statement in accordance with Practice Direction 57AC. I understand that the purpose of this statement is to set out the evidence on which I will rely in relation to the issues which will have to be decided by the trial Judge. I have not been coached or encouraged by anyone to include anything in this statement that is not my own true recollection.
6. My father died on 01 August 2024 aged 90. He was a retired chairman of a pharmaceutical company. My Mother Radha, died in 2022. I am one of the two surviving children. The Defendant, VIJAYALAKSHMI WORTLEY is the daughter of Krishnaswami Venkataramanan and is my younger sister.
7. **My relationship with the Defendant has been fraught for many years. In July 2013, a restraining order was issued against me by the Court prohibiting me from contacting the Defendant and her family directly or indirectly. I have respected this order. However, it has been used by the Defendant to distance my father from me and to exclude me entirely from his estate.**
8. Following my father's death, I instructed lawyers to contact the Defendant. Formal letters were sent by recorded post, dated on 04/12/2025, 20/01/2026 and 27/01/2026. While the Defendant accepted an initial letter on 08/12/2025 sent via Royal mail signed for service, she has subsequently and systemically refused to accept further letter on 20/01/2026 and pre-action protocol letter on 27/01/2026.
9. Following the issuance of the claim, the defendant finally disclosed the 2021 and 2022 Wills in April 2026. This confirms that the litigation achieved its primary

objective and that the claim was only necessary due to the Defendant's unreasonable and obstructive pre-action conduct.

10. Despite achieving disclosure, the Defendant has refused to agree to a consent order regarding the costs I have incurred including the court fees.

11. I respectfully request the Court to summarily assess my costs as set out in the attached statement of costs.

Statement of truth

12. I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Mohini Hersom

Signature:

Mohini Hersom

Dated: 08/05/2026

8/ May 2026