

**From:** Eleanor Clarke Eleanor.Clarke@Myerson.co.uk  
**Subject:** FAO Abu Sufian - The Estate of Krishnaswami Venkataramanan, your client Mohini Hersom Ref Myerson:MA:128895-0001  
**Date:** 12 May 2026 at 15:54  
**To:** 160 Fleet Street Chambers info@160fleetstreetchambers.co.uk  
**Cc:** Rebekah Jackson Rebekah.Jackson@myerson.co.uk

EC

Dear Mr Sufian,

We refer to your email below.

Your client's position on costs is misconceived. This matter cannot properly be characterised as a discrete or self-contained "disclosure claim", but forms part of a wider, ongoing dispute concerning the administration of the estate.

As a matter of principle, you cannot hive off one aspect of a live, ongoing dispute and seek to recover costs as a self-contained success when the substantive issues between the parties, as pleaded, remain unresolved. We do not accept that the proceedings were reasonably or proportionately required, nor that any alleged delay on the part of our client justifies the costs position you advance.

In those circumstances, it is wrong to suggest that your client is the "successful party" for the purposes of CPR 44.2. As set out previously, our view in light of your revised position is that your claim should be discontinued and costs dealt with accordingly.

In addition, you have failed to provide any draft directions. In light of the applicable deadline, we have now filed and served the Defendant's own proposed directions.

Whilst our client is willing to consider pragmatic case management proposals, any suggestion of a stay for the purpose of determining a standalone costs application is not appropriate in the context of an ongoing dispute of this nature.

Please confirm your client's position as to how you propose the matter should proceed.

Yours sincerely,

**Eleanor Clarke**  
**Partner | Contentious Trusts & Probate**

T: 0161 941 4000  
E: eleanor.clarke@myerson.co.uk

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**From:** 160 Fleet Street Chambers <[info@160fleetstreetchambers.co.uk](mailto:info@160fleetstreetchambers.co.uk)> **On Behalf Of** 160 Fleet Street Chambers <[info@160fleetstreetchambers.co.uk](mailto:info@160fleetstreetchambers.co.uk)>  
**Sent:** 09 May 2026 7:00 PM  
**To:** Rebekah Jackson <[Rebekah.Jackson@myerson.co.uk](mailto:Rebekah.Jackson@myerson.co.uk)>  
**Subject:** Re: Abu Sufian - The Estate of Krishnaswami Venkataramanan, your client Mohini Hersom  
Ref Myerson:MA:128895-0001

Dear Ms. Jackson,

We refer to your letter dated 07 May 2026. Our client does not intend to file a Notice of Discontinuance at this stage. As previously stated, the Claim was only necessitated by your client's 18-month delay and unreasonable conduct in disclosing the Will and other documents. Please be advised that our client is currently filing an **Application (Form N244)** for a Summary Assessment of Costs. We contend that the Claimant is the successful party as the primary objective of the claim (disclosure) was achieved only upon issuance. We will be asking the Court to order the Defendant to pay the Claimant's costs pursuant to **CPR 44.2**, based on the Defendant's unreasonable pre-action conduct. We propose that the parties **jointly request a 28-day stay** to allow the Court to determine the N244 Cost Application without needing a full CCMC or filing further Directions Questionnaires. If you do not agree to a stay, we will file our Directions Questionnaire by the deadline, specifically noting that the only remaining issue for the Court's determination is the assessment of costs.

We look forward to your response.

Yours Sincerely

160 Fleet street chambers

**160 Fleet Street Chambers**  
*Public access litigation barristers*  
107-111 Fleet Street, London, EC4A 2AB, U.K. tel +44 (0)2045347520 )

On Thu, 7 May 2026 at 18:51, Rebekah Jackson <[Rebekah.Jackson@myerson.co.uk](mailto:Rebekah.Jackson@myerson.co.uk)> wrote:

Dear Mr Sufian,

Please see the attached correspondence for your attention.

Kind regards,  
Rebekah

**Rebekah Jackson**  
**Trainee Solicitor | Contentious Trusts & Probate**

T: 0161 941 4000

E: [rebekah.jackson@myerson.co.uk](mailto:rebekah.jackson@myerson.co.uk)

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**From:** Rebekah Jackson <[Rebekah.Jackson@myerson.co.uk](mailto:Rebekah.Jackson@myerson.co.uk)>

**Sent:** 22 April 2026 5:05 PM

**To:** [info@160fleetstreetchambers.co.uk](mailto:info@160fleetstreetchambers.co.uk)

**Cc:** Eleanor Clarke <[Eleanor.Clarke@Myerson.co.uk](mailto:Eleanor.Clarke@Myerson.co.uk)>

**Subject:** RE: Abu Sufian - The Estate of Krishnaswami Venkataramanan, your client Mohini Hersom  
Ref Myerson:MA:128895-0001

Dear Mr Sufian,

Further to previous correspondence, please find the attached for your attention.

We look forward to your response.

Kind regards,  
Rebekah

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**From:** Eleanor Clarke <[Eleanor.Clarke@Myerson.co.uk](mailto:Eleanor.Clarke@Myerson.co.uk)>

**Sent:** 02 April 2026 8:37 PM

**To:** 160 Fleet Street Chambers <[info@160fleetstreetchambers.co.uk](mailto:info@160fleetstreetchambers.co.uk)>

**Cc:** Louis Pointon <[Louis.Pointon@myerson.co.uk](mailto:Louis.Pointon@myerson.co.uk)>

**Subject:** FW: Abu Sufian - The Estate of Krishnaswami Venkataramanan, your client Mohini Hersom  
Ref Myerson:MA:128895-0001

Dear Mr Sufian,

Further to my email earlier today, we also attach the exhibit to our client's witness statement.

Yours sincerely,

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**From:** Eleanor Clarke

**Sent:** 02 April 2026 3:19 PM

**To:** 160 Fleet Street Chambers <[info@160fleetstreetchambers.co.uk](mailto:info@160fleetstreetchambers.co.uk)>

**Subject:** Abu Sufian - The Estate of Krishnaswami Venkataramanan, your client Mohini Hersom Ref  
Myerson:MA:128895-0001

Dear Mr Sufian,

Please see the attached correspondence.

Yours sincerely,

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