

IN THE COUNTY COURT AT CENTRAL LONDON
BETWEEN:

MOHINI HERSOM

Claimant

-and-

VIJAYALAKSHMI WORTLEY

Defendant

Particulars of Claim

1. The Claimant is the daughter and a lawful beneficiary of Krishnaswami Venkataramanan ("the Deceased"), who died on 01 August 2024, in the UK.
2. The Deceased died intestate (without a will). The Defendant is the youngest daughter of the Deceased and sister of the Claimant.
3. Both the Claimant and the Defendant have an equal priority right to apply for letters of administration as the children of the deceased.
4. The Defendant has had sole possession and control of the Deceased's assets including the property at 19 Carston Grove, Calcot, reading, RG31 7ZN, and all associated financial records and documentation.
5. Despite letters which were sent on 04/12/2025, 20/01/2026 and 27/01/2026 to the Defendant by the Legal Representative, she has failed to produce a will or any information to the contrary.

6. The Defendant has failed to respond to two initial letters which were posted on 04/12/2025, 20/01/2026 and pre-action protocol letter which was posted on 27/01/2026.
7. The Claimant through her legal representative's letter, made repeated and specific enquiries to the Defendant as to whether the Deceased left a will. The Defendant has failed and refused to confirm or deny the existence of a will. By Refusing to respond to these fundamental enquiries, the Defendant is obstructing the Claimant's right to know the true testamentary status of the Estate and is preventing the lawful administration of the Deceased's affairs.
8. Further, the Defendant failed to provide an inventory of the estate's assets, obstructed the Claimant's right to participate in the administration of the estate, and refused to confirm if any income or benefit is being derived from the estate property.
9. The Defendant has demonstrated a clear and persistent intention to obstruct the administration of the Estate and evade the pre-action protocol. While the Defendant accepted an initial letter on 08/12/2025 sent via Royal mail signed for service (Tracking reference: WM583854811GB), she has subsequently refused to accept further letter posted on 20/01/2026 and pre-action protocol letter posted on 27/01/2026.
10. On 23 January 2026, the Defendant refused to accept a formal letter (Ref: OK534161938GB), and a further pre-action letter posted on 27/01/2026 (Ref: OK534162054GB) remains unacknowledged. This patterns of behaviour confirms that the Defendant is unfit to act as a fiduciary.
11. In 08 July 2013, a restraining order was issued by the Court prohibiting the Claimant from contacting the Defendant and her family directly or indirectly. This order remains a significant legal impediment to the joint administration of the Estate. Given that the parties are legally prohibited from communicating, it is impossible for them to fulfil the fiduciary duties required of joint administrators.

12. By reason of the total breakdown in communication and the Defendant's refusal to account for the estate assets, the Claimant contends that the defendant is unfit to act as an administrator.
13. The Claimant seeks appointment of an independent administrator to ensure the estate is administered transparently and in accordance with the law.

AND

The Claimant Claims

14. An order that, the Court finds a special circumstances under section 116 of the senior Courts Act 1981 making it necessary to pass over the Defendant's entitlement to a Grant of Letters of Administration;
15. An order to appoint an independent administrator for the estate;
16. An order that the Defendant provides a full inventory and account of the deceased's assets within 21 days;
17. An order that the Defendant pays the costs of this claim.
18. Such consequential directions as the court deems appropriate.

STATEMENT OF TRUTH

19. I believe that the facts stated in these particulars of claim 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.

Signed: **Mohini Hersom**
Name: Mohini Hersom
Dated: **26.2.2026**