

On behalf of the Claimant
Witness: Mohini Hersom
Dated: 25/02/2026

IN THE COUNTY COURT AT CENTRAL LONDON
BETWEEN:

Claim No:

MOHINI HERSOM

Claimant

-and-

VIJAYALAKSHMI WORTLEY

Defendant

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 claim for the appointment of an independent administrator.
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 (Tracking reference: WM583854811GB), she has subsequently and systemically refused to accept further letter on 20/01/2026 and pre-action protocol letter on 27/01/2026.
9. On 23 January 2026, the Defendant refused to accept a formal letter (Ref: OK534161938GB), and a further letter sent on 27/01/2026 (Ref: OK534162054GB) remains unacknowledged. The Defendant did not reply to the any of the letters. This patterns of behaviour confirms that the Defendant is unfit to act as a fiduciary.

10. The Defendant remains in sole possession of the family home at 19 Carston Grove and all of my father's financial records. She has failed to provide any inventory of the estate or confirm whether a will exists.
11. Because of the 2013 restraining order, the Defendant and I do not communicate. We cannot legally or practically act as joint administrators. Given the Defendant's silence and hostility towards me, I do not believe she will protect my interest in the estate.
12. I respectfully request the Court to appoint an independent administrator to ensure the estate is handled with honesty and transparency and divided between us equally.

Statement of truth

13. 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.

Signature:

Mohini Hersom

Mohini Hersom

Dated: 25/02/2026

26.2.2026

Confirmation of Compliance with PD 57AC

I confirm that:

I understand that the purpose of this witness statement is to set out matters of facts of which I have personal knowledge.

I understand that it is not my function to argue the case, either generally or on particular points, or to take the court through the documents in the case.

This witness statement sets out only my personal knowledge and recollection, in my own words.

On points that I understand to be important in the case, I have stated honestly a. How well I recall matters and b whether my memory has been refreshed by considering documents, if so how and when.

I have not been asked or encouraged by anyone to include in this statement anything that is not my own account, to the best of ability and recollection, of events I witnessed or matters of which I have personal knowledge.

Signature: *Mohini Hersom*

Mohini Hersom

Dated: *26.2.2026*