

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

Dated:

25/Feb/2020 (6)