

IN THE HIGH COURT AT CENTRAL LONDON
BETWEEN:

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 to invalidate the purported Wills dated on 09 July 2021 and 27 November 2022 and for a declaration of my interest in the family property at 19 Carston Grove, Calcot, reading, RG31 7ZN via proprietary estoppel.
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. Throughout my adult life, my father was very clear about his intentions for his estate. He often told me that his estate is for both me and my sister. However, these promises became more specific in his later years.
9. My father's greatest fear was family conflict. On numerous occasions, he told me if I do not create trouble with my sister and keep peace in the family, I will get my inheritance.
10. I understood this to be a binding family pact. He was asking me to suppress my own grievances and tolerate my sister's behaviour in exchange for my financial security.
11. I took my father's word to heart. To keep the peace, I stepped back and allowed the Defendant and his family members to take control over my father's estate and all the family matters. I did this to my detriment often feeling abandoned, isolated and marginalised, but I did it because I trusted my father's promise that I would be looked after.

12. Had I known that, I would be disinherited despite my efforts to maintain harmony, I would have taken steps to protect my position and legal interests much sooner.
13. By 2021, my father's health began to deteriorate and it was during this period of vulnerability that the Defendant appears to have arranged for new Wills to be signed. I was never informed by the Defendant and my father that, my signed two Wills where he excluded me from the Wills.
14. My father signed those Wills under the undue influence by the Defendant and her family members.
15. My father was a man of his word, and he loved me. The disputed Wills, which leave me with nothing, are a total contradiction of everything he said to me over several decades. They do not represent his true wishes, but rather the result of the Defendant's undue influence and the deceased's lack of capacity.

Statement of truth

16. 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:

11 May 2026