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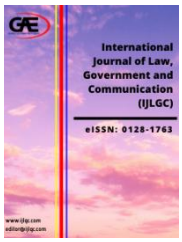

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WILL EXECUTION DURING COVID-19: LEGAL CHALLENGES IN MALAYSIA

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Abstract:

The Coronavirus disease (COVID-19) pandemic has posed several challenges to almost every aspect of our lives including the Wills writing industry. Due to this unprecedented phenomenon, over the past few months, processes, laws, and timelines have all been pushed to their limits. There are considerable practical and legal challenges to consider when making a will while social distancing, isolation, or quarantine measures are in place. This article aims to discuss the formalities that need to be complied with in executing a will and challenges in the Malaysian legal context in an era in which social distancing is the new normal. As Malaysian Law operated on parallel legal jurisdiction, this article limits the scope of discussion to the civil legal position impose on the non-Muslim in Malaysia by referring to Wills Act 1959 only. For this purpose, the discussion adopts the doctrinal analysis by examining the existing primary and secondary materials including statutory provisions, case law, and other legal and non-legal literature related to the will execution under civil law applicable to non-Muslim. This article concludes that restrictions on human interaction are challenging for assessing testamentary capacity and witnessing requirements as both of which are required to ensure the validity of Wills. For the time being, it appears that Malaysian law still insists to follow the strict conventional way of wills execution. The legislature should relax some strict requirement in the Wills Act 1959 during the COVID-19 outbreak or similarly exigent circumstances with several safeguards to ensure the validity of the Wills. A technological tool such as electronic signature, remote execution and digital will also good to be considered as an alternative solution in making a valid Will during pandemics.

Keywords:

Will, Due Execution, Coronavirus, Covid-19, Law, Pandemic, Malaysia

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Introduction

The pandemic of Coronavirus disease (COVID-19) caused by the SARS-CoV-2 virus is not only the greatest threat to global health, but it also has a far-reaching socio, legal and economic impact on almost all countries in the world. The pandemic of COVID-19 started explosively in Wuhan and spread throughout China has been announced by the World Health Organization as a fatal global pandemic. The first Covid-19 cases were reported in Malaysia on 25 January 2019 followed by a quiescent period before an upward swing of the cases at the end of February 2020 (Tang,2020). It begun as a small wave of 22 cases through imported cases and followed by a bigger wave largely from local transmissions resulting in 651 cases (Salim, Chan, Mansor, Bazin, Amaran, Faudzi, Shithil, 2020). This unprecedented infectious disease has compelled the government to impose strict lockdown, mandatory quarantines, restriction of movement and travel bans based on Prevention and Control of Infectious Diseases Act 1988.

In flattening the curve of infection, government also promoting new norms such as social and physical distancing, self-quarantines, and isolation. The first nationwide 14-day Movement Control Order (MCO) was imposed from 18 March to 31 March 2020 in order to curb the spread of infection. Subsequently, the Prevention and Control of Infectious Diseases (Measures within the Infected Local Areas) Regulations 2020 was gazetted to give effect to the MCO. The MCO has further been extended with a gradual easing of restrictions operated under either Conditional Movement Control Order (CMCO) or Recovery Conditional Movement Control Order (RCMO) based on reported cases in certain targeted places.

These new norms have in almost every aspect of our lives, imposed several challenges where things that are used to be the society way of live were no longer as simple as usual. The fear, anxiety and even paranoia proliferated during this far-reaching effect of COVID-19 worldwide has led to an increase interest in succession planning. A lot of testators started to update, revives, or republish their testamentary documents and Wills. Hence, there are considerable practical and legal challenges to be consider when making a Wills while social distancing, isolation or quarantine measures are in place (Cyril,2020). Strict government measures to prevent the infection of this disease pose major challenges to the practical side of Will's execution. (Simon,2020). Will drafting and execution normally requires the client to physically enter the lawyer's office to sign the will (Torres,2021). This article discusses on the formalities that need to be comply in executing a Will and challenges in the Malaysian legal context and suggests several potential solutions. However, this article limits the scope of discussion to the civil legal position in Malaysia by referring to the Wills Act 1959 only.

Making a Will in Malaysia

It is trite that a testator could bequeath his estate to any person. The only instance the probate could be set aside is if the plaintiffs had established that the testator did not have testamentary capacity to execute the said will. However old a testator may be, he is free to create Will as the law does not require the integrity of the body, but of the mind (*Tan Kay Soon* v. *Tan Ching Ling* [2020] 1 LNS 246). Nevertheless, in the case of an aged testator or a testator who has suffered a serious illness, there is one golden rule which should always be observed. The process of making of a Will by such a testator ought to be witnessed or approved by a medical practitioner who satisfies himself with the capacity and understanding of the testator, and records and preserves his explanation and finding (*Kenward* v. *Adams* [1975] CLY 3591; *Re Simpson, Deceased; Schaniel* v. *Simpson* [1977] 121 SJ 224). Consideration of the Golden

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Rule has since been recognised as good practice, particularly where the testator's capacity is likely to be contested.

In Malaysia, it is trite law that for a Will to be valid, a testator must have testamentary capacity (Halim, 2018; Noor & Halim,2016). A testator must be of sound mind, memory and understanding, and has not been shown to have been suffering from any testamentary incapacity (*Chin Jhin Thien & Anor* v. *Chin Huat Yean & Anor* [2020] 7 CLJ 137). Whether a testator has testamentary capacity depends on the facts of each case. A presumption exists in law that a testator is sane and capable of disposing of property by a Will has been held in *Sarah binti Abdullah @ Hew Lee Ling (P)* v. *Kwok Peck Wah (P) and Anor* [2010] 1 CLJ 706. In *Lim Kang Hai & Ors* v. *Lim Chik Lock* [2013] 1 LNS 539, it was held that there are two basic legal requirements for a valid Will. Firstly, the testator must be capable of understanding what he is doing when he makes the will. Secondly the testator must understand what is in the Will must truly reflect what he freely wishes to be done with his estate on his death. To understand the nature of the Will, the testator must reach the age of majority which is eighteen years old as prescribed in Age of Majority Act 1971.

A natural starting point in examining the English approach to testing capacity for wills and is provided by *Banks* v. *Goodfellow* [1870] LR 5 QB 549, which laid down the capacity test for wills (Ho,2021). What is meant by testamentary capacity has been laid down in a classic statement contained in the judgement by Chief Justice Cockburn in that case more than a century ago. The court in the case held as follow.

> It is essential to the exercise of such a power that a testator shall understand the nature of the act and its effects; shall understand the extent of the property of which he is disposing; shall be able to and, with a view to the latter object, that no disorder of the mind shall poison his affections, pervert his sense of right, or prevent the exercise of his natural faculties - that no insane delusion shall influence his will in disposing of his property and bring about a disposal of it which, if the mind had been sound, would not have been made...

The above case not only lays down the test for will-making capacity. It also makes it clear that a partial unsoundness of mind, not affecting the person's general faculties and not operating on the person's mind in regard to a particular testamentary disposition, will not be sufficient to deprive the person of the power to dispose of their property in a Will. The test to be applied in ensuring that a testator is mentally capable of making a valid will in *Banks* v. *Goodfellow* has been reiterated in several Malaysian case laws such as *Udham Singh* v. *Indra Kaur* [1971] 2 MLJ 263, *Tho Yow Pew & Anor* v. *Chua Kooi Hean* [2002] 4 CLJ 90, *Gan Yook Chin & Anor* v. *Lee Ing Chin & Ors* [2004] 4 CLJ 309 and *Tan Cheu Kee* v. *Lim Siew Hwa* [2016] 1 LNS 1684. A testator's intention must be ascertained as memorialised in the written text of the will read as a whole, taking into account also the purpose of the text and its context (Moosa,2021).

It can be said that there are four requirements for a testator in making a valid will. Firstly, a testator must understand the nature of making a Will and its effects. This does not require the testator to have a full understanding of the legal terminology of the will. A broad understanding of the will's effect is essential. Secondly, a testator must understand the extent of the property of which they are disposing. In other words, a testator must have some idea of the extent of the property of which they are disposing. Nevertheless, this requirement does not mean that the testator must know the detailed or intricate inventory. It is sufficient that the testator can

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appreciate the extent of their wealth. Thirdly, a testator must be able to comprehend and appreciate the claims to which they ought to give effect. In other words, a testator must be aware of the persons for whom he would usually be expected to provide for, even if he chooses not to. Lastly, a testator must have no disorder of the mind that prevents their sense of right or prevents the exercise of their natural faculties in disposing of their property by Will. In this case, the testator must be free from any delusion of the mind that would cause him reason not to benefit those people.

Due Execution of Will

Malaysian law applies a strict regulation as regards to the due execution of Will. In order to be valid, a Will must comply with Section 5 of the Wills Act 1959's technical or formal statutory requirements. Wills Act 1959 as modelled on Britain's Wills Act, 1837 and section 5 is in *pari materia* with section 9 of Britain's Act. The formalities seek to protect the testator from fraud or undue influence, to provide evidence of the testator's intent, and to remind the testator of the seriousness of the endeavor (Gary, 2020). It is premised on four justifications and functions namely, evidentiary function, ritual function, protective function, and channelling function. Firstly, the writing and signature elements help to clarify the wishes of the testator (the evidentiary function). Secondly, a witnessed document's fanfare reinforces the gravity of the testation (the ritual function). Thirdly, the need for witnesses shields the testator from any claims of suspicious circumstances such as fraud and coercion (the protective function). Fourthly, the courts are rarely left to puzzle whether the document was intended to be a Will or not by shoehorning the wishes of a deceased into a recognisable format (the channelling function) (Gulliver & Tilson, 1941; Langbein, 1975; Garland, 2020; Horton & Weisbord, 2020).

A vital criterion to be taken into account is that all Wills executed in Malaysia under the Wills Act 1959 must be made in writing. Section 5(1) of Wills Act 1950 stated that 'No will shall be valid unless it is in writing and executed in manner hereinafter mentioned'. Apart from that, the Will must also be signed by the testator in the presence of two witnesses. Section 5(2) of the Wills Act 1950 stated that 'Every will shall be signed at the foot or end thereof by the testator or by some other person in his presence and by his direction; such signature shall be made or acknowledged by the testator as the signature to his will in the presence of two or more witnesses present at the same time, and such witnesses shall subscribe the will in the presence of the testator, but no form of attestation shall be necessary'.

Three important matters are emphasised in the above subsections. First, in both cases, in the joint presence of the two attesting witnesses, the testator must either sign the will or acknowledge the signature already made into his Will. Secondly, in the presence of the testator, both attesting witnesses must sign the Will, after the testator placed his signature on the Will or acknowledged his previously made signature. Thirdly, it is not essential for both attesting witnesses to sign in the presence of each other. The act of execution, including the attestation of the witness, should be one continuous act. The best practice is for the witnesses to sign immediately after the testator.

Legal Challenges During Coronavirus Disease (COVID-19) Pandemic

Although the above formalities for executing a will are not difficult and can usually be easily observed, testators will likely face certain barriers in fulfilling them during this unprecedented situation such as the COVID-19 pandemic. Some of the barriers or challenges are as follows.

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Accessing A Lawyer to Assist in Preparing the Will

Although there is no compulsory requirement for a testator to see a lawyer in making a will, it is good practise for lawyers to insist on seeing a testator alone and in person to take their directions. This enables the lawyer to determine and evaluate the testamentary capacity of their client and whether the testator has acted on their own free will in making the will. It also seeks to dispel the suspicious circumstances element, such as that the testator may not be unfairly affected or coerced by any other party.

Nevertheless, this practise has been tough in recent months due to several movement restriction orders enforced by the Malaysian government. It is so as the testators are spending most, if not all, of their time at home with very little outside communication or socialising, at least on a physical level and in-person meetings are not possible. Anecdotal reports indicate that an increasing number of anxious testators have prepared and signed homemade Wills. Simon & Simon (2020) suggested that it will be possible to provide instructions for the new will over the telephone or on videoconferencing facilities. These are important to assess other key requirements, such as the mental capacity of the testator to make a will and to ensure that there is no undue influence being exerted on the testator.

Will Must Be in Writing

According to Section 3 of the Interpretation Acts 1948 and 1967 'writing' is defines to include a digital form "writing" or "written" includes type writing, printing, lithography photography, electronic storage or transmission or any other method of recording information or fixing information in a form capable of being preserved". Hence, the creation of Wills incorporates not only a handwriting but also includes computer generated document as long as it is in a perpetual form and must be well-preserved.

Wet in Signature

While electronic signatures have become acceptable in recent years for many legal documents, this has not been the case for Wills. This is because, while executing a will, the law wishes to safeguard against the potentially increased risk of fraud or undue influence. It is also to be noted that there is a wide perception that the Electronic Commerce Act 2006, which provides the law for e-signatures, had specifically excluded the application of the Electronic Commerce Act 2006 on Wills. Section 2 provides that Electronic Commerce Act 2006 shall not apply to the transactions or documents relating to the creation of wills and codicils. (Jeyakuhan, 2020). In other words, relevant parties must ensure that wet-ink signatures are used in any document or transaction relating to the creation of wills and codicils.

Jeyakuhan (2020) believes that the exclusionary provision indicates that the Malaysian Parliament is not prepared to recognise the Will to be virtually signed by the testator or the witnesses. Not to mention that the Bar Council has taken the position that it is unlikely that witnessing a signing via a screen meets the requirement that the witness be present during the signing process. The Digital Signatures Act 1997, another relevant statute, is of no importance here, as it is more like a process rather than a mere symbol attached to an electronic document. Temporary Measures for Reducing the Impact of Coronavirus Disease 2019 (COVID-19) Act 2020 is also silent on this issue.

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Witnessing A Will

The social and physical distancing and movement restriction requirements promotes by the government have made it impossible to legally execute a will. The absence of available witnesses has created circumstances in which a cauldron of conspiracies can prosper. If a testator is self-isolating or observing the rules on social distancing due to the COVID-19 pandemic, it will not be possible to meet with them face-to-face to witness them signing their will. It will also be difficult for the testator to find an independent person to act as witness in these circumstances. These formal requirements create the need for at least three individuals namely the testator which is the person signing the will and two witnesses to be present together at the same time. These three individuals all must be able to see one another during the signing of the will, and all adding their signatures to the same hard copy document. (Simon & Simon,2020).

It is important to note that the witnesses cannot be persons who benefit under the will. Even though, section 8 of Wills Act 1959 provides that a Will is not to be invalidated by reason of incompetency of attesting witness, it is important to make sure that the witness is not those who are listed in the Will. This is so as section 9 of the Wills Act 1959 provides that gifts to an attesting witness or to wife or husband of attesting witness to be void. Hence, for many people, this situation means that members of their immediate household are disqualified from being witnesses. Nevertheless, an executor may be competent to be a witness to a will as provided by Section 11 Wills Act 1959.

'Physical' Presence

In the Section 5 of Wills Act 1959, the word presence denotes the physical presence of the testator and witnesses. In *Sawinder Kaur Fauja Singh* v. *Charnjit Singh Thakar Singh* [1998] 1 CLJ Supp 402, Zainun Ali JC (as Her Ladyship then was) held that 'as it stands, section 5(2) Wills Act 1959 is equivocal in its terms. The operative words are clearly of a peremptory nature, so it is clear that the testator must acknowledge his signature in the real visual presence of two or more witnesses. (Jeyakuhan, 2020).

In the case of *Brown* v. *Skirrow* [1902] P 3, the person making the will executed her will in a hectic shop. One witness saw her sign the will. However, the other witness was not immediately nearby and was having a conversation with another customer when it was signed. They then signed the will afterwards to witness the document because the testatrix had asked him to. The judge held it was not validly executed. It was held that the witnesses must have a clear line of sight and presence must mean 'visual presence'. It did not matter that the person had acknowledged her signature to second witness, since that acknowledgment needed to take place in the presence of both witnesses before they each attested it.

The rule is different in the case of *Casson* v. *Dade* (1781) 1 Bro.C.C. 99. In this case a maid was in a carriage and witnessed a will through a window when a horse pulling the carriage reared up, offering her a line of sight of the moment of signature. This case is an example of where the circumstances were enough to meet the witnessing requirements. In *Couser* v. *Couser* [1996] 1 W.L.R 1301, in which it was said that a valid acknowledgment of a signature under the Wills Act required that there should be at least possible visual contact. Casson v Dade was also applied by Senior Judge Lush in Re Clarke in 2011 when a lasting power of attorney was held to have been validly executed where the donor was in one room and the witnesses in another, separated by a glass door.

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The emphasis in the cases is on the policy objective of ensuring that the witness can say that the document in question is the testator's true will and that "presence" has consistently been considered to require a line of sight or visual contact. If this goal can be achieved through a glass pane, it can arguably be achieved by viewing through a screen.

Possible Solution

As catastrophic as the COVID-19 pandemic seems, it brought about several welcoming changes. History was made on 23 April 2020 when the Court of Appeal live-streamed its proceedings conducted via Skype for the first time ever to the general public on Youtube Live. From then on, courts in Malaysia began to transition at a gradual, steady pace into online hearings (Jeyakuhan, 2020). The Rules of Court (Amendment 2020) has come into operation on 15 December 2020. The Rules of Court 2012 [P.U. (A) 205/2012] are amended in Order 1, in rule 4, by inserting the definition of "remote communication technology", has the same meaning assigned to it under the Courts of Judicature Act 1964 (Act 91), the Subordinate Court Act 1948 and the Subordinate Courts Rules Act 1955(Act 55). The new Order 33A the Rules of Court (Amendment 2020), shall apply to any proceedings conducted through a remote communication technology. If the court proceedings can be conducted thorough live-streamed, Will execution definitely can be done in the same manner. In circumstances where in-person witnessing is not practicable, the law could allow electronic signatures for the testator and the two witnesses, being present via a life streaming ceremony. The live-streaming ceremony may achieve the four functions of due executions of will namely, evidentiary, ritual, protective and channelling functions.

While this does not meet the strict formal requirements for the valid signing of a will, it may nevertheless be an option when there is no other alternative. Once the COVID-19 measures have been lifted, any wills signed using such technologies can be updated by signing a new version of the will in compliance with the formalities required by the Wills Act. (Simon & Simon,2020). Another technological solution available is by honouring the concept of digital Will. To achieve this, a new parliamentary act has to be introduced to cater for the digital wills, or amend the existing Wills Act 1959 to provide for it. There are certainly some loops to jump through before a digital Will be recognised in Malaysia. The risks of the contents of the digital will being altered against the testator's wishes would need to be addressed. (Jeyakuhan, 2020).

Conclusion

Restrictions on human interaction are problematic for assessing capacity and witnessing requirements. This is so as both conditions are required to ensure the validity of wills. For the time being, it appears that Malaysian law still insist to follow the strict conventional way of wills execution. In other words, testators are bound by the conventional way in preparing a will. The due execution as described in the current legislation required that a will must be in writing and signed by the testator or other person in the presence and instruction of testator and witnessed by two or more witnesses physically present at the same time.

In order to bring the law into line with our newly anxious times, during the COVID-19 outbreak or similarly demanding circumstances, the legislature should relax some strict requirements in the Wills Act 1959 without ignoring a proper safeguard to ensure that the Wills are still preserved. Although no solution is fool proof and technology is not yet an affiliate, some techniques can help testators overcome the obstacles and complications associated with the

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execution of a Will at the time of COVID-19. The technological tool such as electronic signature, remote execution and digital will may be an alternative solution in making a valid Will while social and physical distancing, isolation, movement restriction or quarantine measures are in place.

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