${court}

CASE NO.: ${casenumber}

In the matter between:

**${onepname}** ${firstplaintiff}Plaintiff

${twop}

**${twopname}** Second Plaintiff

${/twop}

${threep}**${threepname}** Third Plaintiff

${/threep}

${fourp}**${fourpname}** Fourth Plaintiff

${/fourp}

${fivep}**${fivepname}** Fifth Plaintiff

${/fivep}

${sixp}**${sixpname}** Sixth Plaintiff

${/sixp}

${sevenp}**${sevenpname}** Seventh Plaintiff

${/sevenp}

and

**${onedname}** ${firstdefendant}Defendant

${twod}

**${twodname}** Second Defendant

${/twod}

${threed}**${threedname}** Third Defendant

${/threed}

${fourd}**${fourdname}** Fourth Defendant

${/fourd}

${fived}**${fivedname}** Fifth Defendant

${/fived}

${sixd}**${sixdname}** Sixth Defendant

${/sixd}

${sevend}**${sevendname}** Seventh Defendant

${/sevend}

${eightd}**${eightdname}** Eighth Defendant

${/eightd}

**DAMAGES AFFIDAVIT**

I, the undersigned

**[Deponent’s name]**

do hereby make oath and say that:

1. I am duly authorised to depose to this affidavit, the facts herein stated being within my own personal knowledge unless the contrary is indicated or appears from the context, and the facts are to the best of my belief both true and correct.

2. I am employed as a loss adjuster at [place of employment].

3. I have had the experience as reflected in annexure "**A**" in assessing damage suffered as a result of [general, domestic, commercial and corporate non-motor claims having specifically been exposed to large fire, theft, fidelity guarantee and money losses/claims]**.**

4. Accordingly, I am an expert in assessing damage suffered as a result of demolition and construction works.

5. On or about [date] I was instructed to inspect the premises of the ${represent} at [address].

6. I compiled a report which I attach herewith marked annexure “**B**”. With specific reference to the damages indicated in the report and would note that the ${represent} suffered damages caused [due to certain demolition and construction works by the First, Second, Third and Fourth Defendants in this matter. The loss is summarized in the quotation sheet attached hereto as annexure “C” as settled by the Plaintiff’s insurers as indicated and confirmed in the agreement of loss attached hereto as annexure “D”:]

6.1 [list of damages and quantum]

6.2 […]

7. After assessing the damage to the premises, with specific reference to the items listed above, I am of the opinion that the necessary, fair and reasonable costs of putting the ${represent} into the position [he/she/it]would have occupied, before the damage took place amounts to [quantum]**.** I respectfully refer the Honourable Court to copies of the relevant invoices confirming the itemized losses suffered above.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**[DEPONENT’S NAME]**

I certify that the deponent acknowledged that he knew and understood the contents of the above declaration, that I duly administered the oath as prescribed by Government Notice No R1258 of 21 July 1972, as amended and that thereafter the deponent in my presence, signed the declaration at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_on the \_\_\_ day of **${month} ${year}**.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**COMMISSIONER OF OATHS**