${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. The facts contained herein are, unless otherwise stated, within my personal knowledge and are both true and correct.
2. I am qualified as a motor assessor employed as such by [employer].
3. I enclose herewith a copy of my Curriculum Vitae annexed hereto marked **Annexure “A”.**
4. By virtue of my knowledge, trade and experience, I am an expert in the field of motor vehicles, panel beating, replacing parts of damaged motor vehicles and assessing pre and post collision values of damaged motor vehicles, as well as determining the fair, reasonable and necessary costs of repairing vehicles.
5. I have [number of years] years’ experience in maintaining, assessing damages, determining the costs in relation to the replacement of parts and repair of motor vehicles [, inclusive of trucks and other gross weight vehicles].
6. I confirm that as part of my profession I assess all aspects of damage to motor vehicles and in particular ascertain the reasonable panel beating costs as well as determine the reasonable costs of repairing damaged motor vehicles. During this time, I have acquainted myself thoroughly with the fair and reasonable prices of all spare parts, old and new, for a wide range of motor vehicles[, including both commercial vehicles and trucks].
7. On [date], I inspected a [model of vehicle]motor vehicle, bearing registration number [registration number], which had sustained damage in a motor vehicle collision, for the purposes of assessing the costs of repair thereto.
8. Having had regard to the damage sustained to the ${represent}’s motor vehicle, I concluded that the fair and reasonable costs of repairing the ${represent}’s motor vehicle to its pre collision condition was [amount]. A copy of the Tax Invoice is annexed hereto, marked **“B”**.
9. I accordingly concluded that it would be economical to repair ${represent}’s motor vehicle and confirm that the damages, which I observed on the vehicle, were consistent with it having been damaged in only one collision.
10. My opinion is based upon my knowledge, training and experience as an expert in the field of assessing damage to motor vehicles, the cost of repairing such damages, as well as the new and second hand spare parts of motor vehicles.

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

**[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**