

AFFIDAVIT AS TO DOCUMENTS

(O. 11, R. 13)

In the Court of

A.B. (add description and residence) Plaintiff

against

C.D. (add description and residence) Defendant

I, the above-named defendant C. D., make oath and say as follows:-

1.1 have in my possession or power the documents relating to the matters in question in this suit set forth in the first and second parts of the first schedule hereto.

2.1 object to produce the said documents set forth in the second part of the first schedule hereto [state grounds of objection].

3.1 have had but have not now, in my possession or power the documents relating to the matters in question in this suit set forth in the second schedule hereto.

4. The last-mentioned documents were last in my possession or power on [state when and what has become of them and in whose possession they now are].

5. Accordingly to the best of my knowledge, information and belief I have not now, and never had, in my possession, custody or power, or in the possession, custody or power of my pleader or agent, or in the possession custody or power of any other person on my behalf, any account, book of account, voucher, receipt, letter memorandum, paper or writing, or any copy of or extract from any such document, or any other documents whatsoever, relating to the matters in question in this suit or any of them, or wherein any entry has been made relative to such matters or any of them, other than and except the documents set forth in the said first and second schedules hereto.

Dated :

Defendant

Verification:

I, _____, do hereby verify that the contents of the above Affidavit from paras 1 to _____ are correct and true to the best of my knowledge and personal belief and no part of it is false and nothing material has been concealed therein.

Affirmed at (Name of Place) this _____.

Defendant