FORM 30A

AFFIDAVIT OF DOCUMENTS

(INDIVIDUAL)

(General Heading - Form 4A)

AFFIDAVIT OF DOCUMENTS

(Recital as in Form 4D)

- 1. I have conducted a diligent search of my records and have made appropriate enquiries of others to inform myself in order to make this affidavit. This affidavit discloses, to the full extent of my knowledge, information and belief, all documents relating to any matter in issue in this action that are or have been in my possession, control or power.
- 2. I have listed in Schedule A those documents that are in my possession, control or power and that I do not object to producing for inspection.
- 3. I have listed in Schedule B those documents that are or were in my possession, control or power and that I object to producing because I claim they are privileged, and I have stated in Schedule B the grounds for each such claim.
- 4. I have listed in Schedule C those documents that were formerly in my possession, control or power but are no longer in my possession, control or power, and I have stated in Schedule C when and how I lost possession or control of or power over them and their present location.
- 5. I have never had in my possession, control or power any document relating to any matter in issue in this action other than those listed in Schedules A, B and C.

(SWORN, etc. as in Form 4D)

(signature of deponent)

CERTIFICATE OF LAWYER

I CERTIFY that I have explained to the deponent the necessity of making full disclosure of all relevant documents.

(Date)

(signature of lawyer)

SCHEDULE A

Documents in my possession, control or power that I do not object to producing for inspection.

(Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it).

SCHEDULE B

Documents that are or were in my possession, control or power that I object to producing on the grounds of privilege.

(Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it. State the grounds for claiming privilege for each document).

SCHEDULE C

Documents that were formerly in my possession, control or power but are no longer in my possession, control or power.

(Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it. State when and how possession or control of or power over each document was lost, and give the present location of each document).