

**IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG LOCAL DIVISION**

Case number: 2019/445
Original case no: 1982/130

In the matter of:

**THE REOPENED INQUEST:
LATE NEIL HUDSON AGGETT**

AFFIDAVIT OF JONATHAN LEON JOFFE

I, the undersigned

JONATHAN LEON JOFFE

do hereby make oath and state that:

1. I am an adult male born on 8 December 1958. I am currently the Chief Executive Officer of a technology company called QTec Analytics. I reside at 7 Sunset Road, Newton, MA, 02458, USA.
2. Unless the context indicates otherwise, the facts contained in this affidavit are within my personal knowledge and are, to the best of my belief, both true and correct.
3. I have been sent the bundle of photographs which I am told have been submitted to the above honourable court as exhibit G31.1. I attach as Annexure "JJ1" the



email whereby such exhibit was sent to me by one of the legal representatives for the Aggett family, Samantha Robb from Webber Wentzel.

4. I confirm that I took these photographs between March and May of 1984 when I was still living in South Africa. The photographs were taken on the steps of the (then) Supreme Court of South Africa, Transvaal Provincial Division in Pretoria at the hearing of Auret van Heerden's damages claim against the Security Branch. I am informed that the main judgment cannot be found but that the Judgment of the application for leave to appeal is cited as *Van Heerden v Cronwright and others 1985 (2) SA 342 (T)*.
5. I took the photographs for my own purposes. Auret van Heerden was a close friend of mine and so I attended his hearing. It was also rare to have the security police in the spotlight and I took the opportunity to photograph them. At the time I was affiliated with SASPU National and expected that I would have passed the photographs on to the newspaper.



JONATHAN LEON JOFFE

The Deponent has acknowledged that he knows and understands the contents of this affidavit, which was signed and affirmed before me at Newton, MA on this the 15th day of February 2020. The relevant regulations have been complied with.



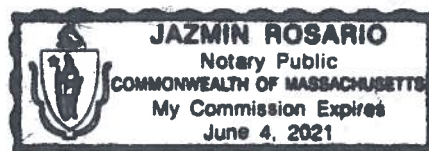


NOTARY PUBLIC

FULL NAMES: Jazmin Rosario

DESIGNATION: Notary

ADDRESS: 982 Sea St, Quincy, MA 02169



J.R. 

Annexure JJ1

Samantha Robb

From: Samantha Robb <samantha.rob主@webberwentzel.com>
Sent: 12 February 2020 18:15
To: jljoffe@gmail.com
Cc: Moray Hathorn; Caelyn Eedes
Subject: Photograph bundle and draft affidavit
Attachments: Mimecast Large File Send Instructions

I'm using Mimecast to share large files with you. Please see the attached instructions.

Dear Jonty

Please find attached the photograph bundle that has been handed up to the court as an exhibit (exhibit 31.1).

I also attach a draft affidavit based on the information that you provided me with today. Please amend the affidavit if necessary and send it back to me. I will then send you a PDF version of the affidavit with this email as attachment JJ1.

You will need to get the affidavit commissioned in front of a notary public or the American equivalent of a commissioner of oaths.

Kind regards

Samantha Robb | Associate

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J.R. 