



**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

I, the undersigned,

BEVERLEY NAIDOO

hereby make oath and state:

1. I am a writer of a number of published works, amongst them Death of an Idealist, the life story of Neil Aggett.
2. I have read the affidavit of Richard Wragg, the manager of Special Collections at the University of Sussex, and confirm its contents in so far as they are within my knowledge. I specifically confirm that Annexure RW1 to his affidavit is a complete description of the Aggett Inquest documents that I have deposited in the Special Collections unit.

3. When I commenced with my research for the writing of the book, I visited one of the Aggett Inquest attorneys, David Dison, in Johannesburg at his offices on Thursday the 18th August 1994 after visiting the parents of Neil Aggett in the Cape. Neil's father, Aubrey Aggett, had granted me permission to remove a set of the Aggett legal team's dockets in Mr Dison's possession for the purposes of researching Neil's life and his death at the hands of the Security branch of the South African police.
4. I further confirm that Mr Dison handed me the five dockets which form part of the collection outlined in Annexure RW1 to Mr Wragg's affidavit. After I had used them for researching the book I deposited them on behalf of the Aggett family, of which I am part, at the University of Sussex.

Signed and sworn by the deponent at BOURNEMOUTH, London, England,
United Kingdom on 13 February 2020



BEVERLEY NAIDOO

I hereby certify that the deponent knows and understands the contents of this affidavit and that it is to the best of the deponent's knowledge both true and correct. This affidavit was signed and sworn to before me at BOURNEMOUTH on this the 13 day of
ENGLAND



FEBRUARY 2020, and the Regulations contained in Government Notice R.1258 of 21
July 1972, as amended by R1648 of 19 August 1977, and as further amended by
R1428 of 11 July 1989, having been complied with.



NOTARY PUBLIC

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