

I, the undersigned,

ELEANOR DELAINE GROENEWALD

do hereby state under oath:

1.

I am the Head: Litigation and Administration in the Division: Legal and Policy Services in the South African Police Service, situated at 255 Paul Kruger Street, Pretoria.

2.

The purpose of this affidavit is to set out the time line on request for police files as received from both the National Prosecuting Authority as well as the Legal Resource Centre, who indicated that together with Webber Wentzel they are acting on behalf of the Aggett family.

3.

On 29 December 2017 a request for police files was received from Advocate S Singh via electronic mail and the request related to death of Dr H Haffejee. On 03 January 2018 an electronic mail was received from Captain B Nel, who indicated that he is the investigating officer in the re-opened inquest of Dr N Aggett with a list of names and identity numbers or persal numbers.

4.

On 01 March 2018 Captain Nel was informed that certain of the files could be traced and that some of the names without identity or persal numbers could also be traced, as we checked it with the files provided during the re-opened Timol inquest.

5.

On 09 February and 29 March 2018 correspondence was received from the Legal Resource Centre, who indicated that with Webber Wentzel they are acting on behalf of the Aggett family, and a name list with identity numbers were provided in some instances. As the files were traced, the Legal Resource Centre was contacted, who attended at our office to make copies of the files, as the files cannot be provided to private persons. During these visits further name lists were provided and the files traced were provided to them to copy at our office. This was the case from 2018 to 2019.

6.

On 16 September 2019 correspondence was received from Warrant Officer F Kgamanyane, wherein we were informed that the re-opened inquest will commence from 28 January until 20 February 2020 and he requested twenty four (24) files. These files were checked against the name lists provided by Captain Nel and the Legal Resource Centre and some of the identity and persal numbers could be traced. Of these twenty four (24) files, fifteen (15) could not be traced and Warrant Officer Kgamanyane was informed accordingly. He attended at our office on 15 November 2019 to copy the files that could be traced, after we informed him on more than one occasion that the files traced are available.

7.

On 28 January 2020 a name list was received from Webber Wentzel on which we requested whether identity or persal numbers are available. On 06 February 2020 an updated list was received and in some, identity numbers were provided.

8.

The latest name list received consists of fifty one (51) names of which thirty (30) files were already provided to either Captain Nel, Warrant Officer Kgamanyane, the Legal Resource Centre or all. The updated name list has been submitted to our Archive and Registry component on 07 February 2020 and those files previously provided were requested once more.

9.

Our Archive and Registry component indicated that if identity or persal numbers are provided, it takes about one week to trace and submit the files to our office. Where only names are provided, it is more difficult as the system will provide all members on the SAPS PERSAL system with the same names. All these files must then be retrieved and our office must peruse same to ascertain whether it is the correct file on the little information provided by the attorneys. Files are not stored at Wachthuis, the SAPS Head Office, but at Pointins building located in WF Nkomo street.

10.

During the Timol re-opened inquest, it was ascertained that although the PERSAL system contain names, it is difficult to conduct searches on old matters. Our Archive & Registry component do assist as soon as name lists are received and due to the



fact that these are such old files, it is quite an enormous task to do searches without complete information such as identity or persal numbers.

[Handwritten Signature]

DEPONENT

I CERTIFY that the deponent has acknowledged that she knows and understands the contents of this affidavit; has no objection to taking the prescribed oath and considers this oath to be binding on her conscience. Thus done, signed and sworn to before me, at **PRETORIA** on this the day of **FEBRUARY 2020** in terms of the Regulations contained in Government Notice No. R.1258 dated 21 July 1972 (as amended) and Government Notice No. R.1648 dated 19 August 1977 (as amended), which have been complied with.

[Handwritten Signature]

COMMISSIONER OF OATHS

FULL NAMES: SAMUEL MIBELI

CAPACITY: ADMIN ASSISTANT

BUSINESS ADDRESS: 18 CHURCH SQUARE
PRETORIA.

