

IN THE MAGISTRATE'S COURT FOR THE DISTRICT OF **KUILS RIVER**

HELD AT **KUILS RIVER**

Case No: 863/2020

In the matter between -

SEALTEK CAPE (PTY) LTD

Plaintiff

and

SONET FITCHAT

Defendant

FILING NOTICE

PLEASE TAKE NOTE that the Defendant's Discovery Affidavit is filed herewith.

DATED at BRACKENFELL this 30th day of NOVEMBER 2020.



SONET FITCHAT

Defendant

91 Frangipani street

Klein Bron Estate

Brackenfell

7560

Tel: 060 340 1315

E-mail: sonet@cluedapp.co.za



TO: THE CLERK OF THE COURT
Magistrates Court
KUILS RIVER

AND TO: FPS ATTORNEYS
Attorneys for the Plaintiff
Per: **Louis Lourens**
8 Gert Kotze Street
BRACKENFELL
Tel: 021 982 0665
E-mail: louis@fpsslaw.co.za

BY EMAIL: louis@fpsslaw.co.za

AM 5

IN THE MAGISTRATE'S COURT FOR THE DISTRICT OF **KUILS RIVER**

HELD AT **KUILS RIVER**

Case No: 863/2020

In the matter between -

SEALTEK CAPE (PTY) LTD

Plaintiff

and

SONET FITCHAT

Defendant

NO. 13 - DISCOVERY – FORM OF AFFIDAVIT

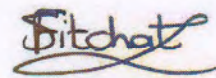
I, the above-named defendant, make oath and say:

1. I have in my possession or power the documents or recordings relating to the matters in question in this cause set forth in the first and second parts of the First Schedule hereto.
2. I object to produce the said documents set forth in the second part of the First Schedule, because they constitute communications regarding the preparation for this case and are protected by legal professional privilege.
3. According to the best of my knowledge and belief, I have not now, and never had in my possession, custody, or power, or in the possession, custody or power of my attorney, or agent, or any other person on my behalf, any document or recording, or copy of, or extract from any document or recording, relating to any matters in question in this cause, other than the documents or recordings set forth in the First Schedule hereto.

AM 8

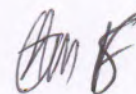
4. I have in my possession both the originals and copies of all the documents set out in the First Schedule, except where specifically indicated that I only have a copy.
5. All correspondence set out in Schedule One is between the Defendant and the party indicated in the name of the document.

DATED at BRACKENFELL this 30th day of NOVEMBER 2020.



SONET FITCHAT

Defendant

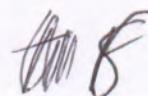


I certify that the deponent has acknowledged that she knows and understands the contents of this affidavit, that she has no objection to taking the prescribed oath, and considers it to be binding on her conscience, which was signed and sworn before me at BRACKENFELL on the 30th day of NOVEMBER 2020.



COMMISSIONER OF OATHS (RSA)
ABRAHAM CHRISTOFFEL MARAIS
Ex Officio - Master Tax Practitioner (SA)
SAIT Membership # 18116439
33 Tasselberry Crescent, Kleinbron Estate
Brackenfell, 7560

**CERTIFIED A TRUE COPY
OF THE ORIGINAL**



SCHEDULE ONE

Part One

1. Not professional

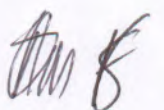
- 1.1. Add A 2019.07.22 Structural Engineer Report.pdf
- 1.2. Add N 2019.10.04 Email with Charl - Fwd_ RE_ Werk sonder toesig.pdf
- 1.3. Add U 2019.10.08 Photos taken on morning after Charls last day.pdf
- 1.4. Add EE 2019.10.14 Email with Structural Engineer - Fwd_ RE_ sien asb aangeheg.pdf
- 1.5. Add OO 2019.10.21-22 Email with Charl - Fwd_ Fianal account.pdf
- 1.6. Add MM 2019.10.21 Email with Charl - RE_ werk afhandel.pdf
- 1.7. Add NN 2019.10.21 Email with Quinton - Re_ Werk op site.pdf
- 1.8. Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 1.9. Add KKK 2020.09.21 Quantification Report.pdf
- 1.10. Add LLL Company Report - SealTek Cape.pdf
- 1.11. Add PP 2019.10.23 Company A Quote.pdf
- 1.12. Add QQ 2019.10.23 Company A Report.pdf
- 1.13. Add SS 2019.10.28 Company B Report.pdf
- 1.14. Add UU 2019.10.30 Company E Report.pdf
- 1.15. Add VV 2019.11.05 TurboMax Quote.pdf
- 1.16. Add WW 2019.11.06 A-Tech Quote.pdf
- 1.17. Add XX 2019.11.14 SBS Waterproofing Quote.pdf
- 1.18. Add AAA 2020.03.04 Triangle Consulting Quote.pdf
- 1.19. Add CCC 2020.03.13 Delta Roofing Report.pdf
- 1.20. Add ZZZ SealTek - Vat Invoice 479.pdf
- 1.21. Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasië van kontrak.pdf

2. External wall cracks:

- 2.1. Add A 2019.07.22 Structural Engineer Report.pdf
- 2.2. Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 2.3. Add KKK 2020.09.21 Quantification Report.pdf
- 2.4. Add CCCC Photo Evidence.pdf
 - 2.4.1. Photograph 1
 - 2.4.2. Photograph 2
 - 2.4.3. Photograph 3
 - 2.4.4. Photograph 4
 - 2.4.5. Photograph 5
- 2.5. Add NNN Datasheet - SealTek AquaPel SealTek Safety Datasheet.pdf
- 2.6. Add OOO Datasheet - SealTek AquaPel Spec Sheet.pdf
- 2.7. Add AAAA SealTek Brochure Sleeve.pdf
- 2.8. Add BBBB SealTek Brochure.pdf
- 2.9. Add YYY Datasheet - Texicryl Scott Bader.pdf (only copy)
- 2.10. Add N 2019.10.04 Email with Charl - Fwd_ RE_ Werk sonder toesig.pdf

3. External wall finish:

- 3.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 3.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 3.3 Add KKK 2020.09.21 Quantification Report.pdf
- 3.4 Add CCCC Photo Evidence.pdf
 - 3.4.1 Photograph 6
 - 3.4.2 Photograph 7
 - 3.4.3 Photograph 8
 - 3.4.4 Photograph 9
 - 3.4.5 Photograph 10



- 3.4.6 Photograph 11
- 3.4.7 Photograph 12
- 3.4.8 Photograph 13
- 3.4.9 Photograph 14
- 3.4.10 Photograph 15
- 3.4.11 Photograph 16
- 3.4.12 Photograph 17
- 3.4.13 Photograph 18
- 3.4.14 Photograph 19
- 3.4.15 Photograph 20
- 3.4.16 Photograph 24
- 3.4.17 Photograph 25
- 3.4.18 Photograph 40
- 3.4.19 Photograph 41
- 3.4.20 Photograph 42
- 3.5 Add U 2019.10.08 Photos taken on morning after Charls last day.pdf
- 3.6 Add R 2019.10.08 Email with Quinton - voorlopige snag lysie Attach.pdf
- 3.7 Add WWW Datasheet - SealTek WeatherCoat Spec Sheet.pdf
- 3.8 Add CC 2019.10.14 Email with Charl - RE_ snag lysie.pdf
- 3.9 Add DD 2019.10.14 Email with Charl - RE_ snag lysie Doc5.pdf
- 3.10 Add OO 2019.10.21-22 Email with Charl - Fwd_ Fianal account.pdf
- 3.11 Add GGGG 2020.03.23 Peeling paint.mp4
- 3.12 Add FFF 2020.03.24 Email with Building Consultant - RE_ Paint texture query.pdf
- 3.13 Add HHHH 2020.03.24 Email with Building Consultant - RE_ Paint texture query RE_ Paint texture query Removing bump.mp4

Am B

4. Waterproofing the walls:

- 4.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 4.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 4.3 Add KKK 2020.09.21 Quantification Report.pdf
- 4.4 Add CCCC Photo Evidence.pdf
 - 4.4.1 Photograph 21
 - 4.4.2 Photograph 22
 - 4.4.3 Photograph 23
 - 4.4.4 Photograph 24
 - 4.4.5 Photograph 25
 - 4.4.6 Photograph 26
 - 4.4.7 Photograph 27
- 4.5 Add EE 2019.10.14 Email with Structural Engineer - Fwd_RE_sien asb aangeheg.pdf
- 4.6 Add PPP Datasheet - SealTek AquaTint Spec Sheet.pdf
- 4.7 Add AAAA SealTek Brochure Sleeve.pdf
- 4.8 Add SSS Datasheet - SealTek PolyScreed Safety Datasheet.pdf

5. Seal all external and internal windows:

- 5.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 5.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 5.3 Add KKK 2020.09.21 Quantification Report.pdf
- 5.4 Add CCCC Photo Evidence.pdf
 - 5.4.1 Photograph 29
 - 5.4.2 Photograph 30
- 5.5 Add BB 2019.10.14 Email with Charl - RE_Chris.pdf

AM 5

6. Painting of the external walls:

- 6.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 6.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 6.3 Add KKK 2020.09.21 Quantification Report.pdf
- 6.4 Add CCCC Photo Evidence.pdf
 - 6.4.1 Photograph 38
 - 6.4.2 Photograph 39
- 6.5 Add WWW Datasheet - SealTek WeatherCoat Spec Sheet.pdf
- 6.6 Add GGGG 2020.03.23 Peeling paint.mp4

7. Ceilings:

- 7.1 Add CCCC Photo Evidence.pdf
 - 7.1.1 Photograph 117
 - 7.1.2 Photograph 118
 - 7.1.3 Photograph 119
 - 7.1.4 Photograph 120
- 7.2 Add G 2019.08.28 Email with Charl - Re_ Fwd_ RE_ Kwotasies.pdf
- 7.3 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasië van kontrak.pdf
- 7.4 Add BB 2019.10.14 Email with Charl - RE_ Chris.pdf
- 7.5 Add LL 2019.10.19 sms with Quinton re cleaners.pdf
- 7.6 Add RRR Datasheet - Sealtek HydroFlex Spec Sheet.pdf
- 7.7 Add TTT Datasheet - Sealtek Products Summary.pdf
- 7.8 Add AAAA SealTek Brochure Sleeve.pdf

Handwritten initials

8. Roof and ridging:

- 8.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 8.2 Add KKK 2020.09.21 Quantification Report.pdf
- 8.3 Add CCCC Photo Evidence.pdf
 - 8.3.1 Photograph 31
 - 8.3.2 Photograph 61
 - 8.3.3 Photograph 62
- 8.4 Add GGG 2020.03.25 Email with Building Consultant - Roof and chimney photos.pdf
- 8.5 Add UUU Datasheet - Sealtek Roof Renew Spec Sheet.pdf
- 8.6 Add VVV Datasheet - SealTek RoofRenew Safety Datasheet.pdf

9. Waterproofing the exposed brickwork underground:

- 9.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 9.2 Add CCCC Photo Evidence.pdf
 - 9.2.1 Photograph 32
 - 9.2.2 Photograph 33
 - 9.2.3 Photograph 34
- 9.3 Add QQQ Datasheet - SealTek DampEnd Spec Sheet.pdf
- 9.4 Add RRR Datasheet - Sealtek HydroFlex Spec Sheet.pdf

10. Structural repair works:

10.1 Chimney

- 10.1.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 10.1.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 10.1.3 Add KKK 2020.09.21 Quantification Report.pdf

10.2 Chimney waterproofing

- 10.2.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 10.2.2 Add KKK 2020.09.21 Quantification Report.pdf

10.3 External wall by braai

- 10.3.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 10.3.2 Add KKK 2020.09.21 Quantification Report.pdf
- 10.3.3 Add CCCC Photo Evidence.pdf
 - 10.3.3.1 Photograph 35

10.4 Weepholes

- 10.4.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 10.4.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 10.4.3 Add KKK 2020.09.21 Quantification Report.pdf
- 10.4.4 Add CCCC Photo Evidence.pdf
 - 10.4.4.1 Photograph 36
 - 10.4.4.2 Photograph 37
- 10.4.5 Add K 2019.09.25 Email with Structural Engineer - Weepholes.pdf

10.5 Stairs

- 10.5.1 Add A 2019.07.22 Structural Engineer Report.pdf
- 10.5.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 10.5.3 Add KKK 2020.09.21 Quantification Report.pdf
- 10.5.4 Add HH 2019.10.16 Email with Structural Engineer - RE_ Trappie.pdf
- 10.5.5 Add CCCC Photo Evidence.pdf
 - 10.5.5.1 Photograph 63
 - 10.5.5.2 Photograph 64
 - 10.5.5.3 Photograph 65

AMB

- 10.5.5.4 Photograph 66
- 10.5.5.5 Photograph 67
- 10.5.5.6 Photograph 68
- 10.5.5.7 Photograph 69
- 10.5.5.8 Photograph 70
- 10.5.5.9 Photograph 71

10.6 Cowlings

- 10.6.1 Add KKK 2020.09.21 Quantification Report.pdf

11. Skirting and internal doors:

- 11.1 Add CCCC Photo Evidence.pdf

- 11.1.1 Photograph 43
- 11.1.2 Photograph 44
- 11.1.3 Photograph 45
- 11.1.4 Photograph 46
- 11.1.5 Photograph 47
- 11.1.6 Photograph 109
- 11.1.7 Photograph 110
- 11.1.8 Photograph 111
- 11.1.9 Photograph 112
- 11.1.10 Photograph 113
- 11.1.11 Photograph 114
- 11.1.12 Photograph 115
- 11.1.13 Photograph 116

- 11.2 Add G 2019.08.28 Email with Charl - Re_ Fwd_ RE_ Kwotasies.pdf

- 11.3 Add Y 2019.10.13 Email with Charl - Re_ Fwd_ RE_ Aftrekkings Sonet brief antwoord in rooi.-1.pdf

12. Boundary wall:

12.1 South Eastern Side Of The Property (bottom wall)

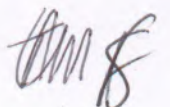
- 12.1.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 12.1.2 Add KKK 2020.09.21 Quantification Report.pdf
- 12.1.3 Add CCCC Photo Evidence.pdf
 - 12.1.3.1 Photograph 48

12.2 North West Side Of Property (washing line)

- 12.2.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 12.2.2 Add KKK 2020.09.21 Quantification Report.pdf
- 12.2.3 Add CCCC Photo Evidence.pdf
 - 12.2.3.1 Photograph 48
 - 12.2.3.2 Photograph 51
 - 12.2.3.3 Photograph 72
 - 12.2.3.4 Photograph 73
 - 12.2.3.5 Photograph 74
 - 12.2.3.6 Photograph 75

12.3 South Western Side (behind pool)

- 12.3.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 12.3.2 Add KKK 2020.09.21 Quantification Report.pdf
- 12.3.3 Add CCCC Photo Evidence.pdf
 - 12.3.3.1 Photograph 48
 - 12.3.3.2 Photograph 49
 - 12.3.3.3 Photograph 50
 - 12.3.3.4 Photograph 56
 - 12.3.3.5 Photograph 57



- 12.3.3.6 Photograph 58
- 12.3.3.7 Photograph 59
- 12.3.3.8 Photograph 60
- 12.3.4 Add S 2019.10.08 Email with Quinton - voorlopige snag lysie.pdf
- 12.3.5 Add R 2019.10.08 Email with Quinton - voorlopige snag lysie Attach.pdf
- 12.3.6 Add U 2019.10.08 Photos taken on morning after Charls last day.pdf
- 12.3.7 Add II 2019.10.17 Email with Charl - Boundary muur.pdf
- 12.3.8 Add HHH 2020.04.15 Email with FPS - Datsheet request.pdf

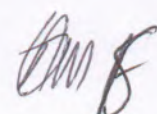
13. Paving installation:

- 13.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 13.2 Add KKK 2020.09.21 Quantification Report.pdf
- 13.3 Add CCCC Photo Evidence.pdf
 - 13.3.1 Photograph 81
 - 13.3.2 Photograph 82
 - 13.3.3 Photograph 83
 - 13.3.4 Photograph 84
 - 13.3.5 Photograph 85
- 13.4 Add P 2019.10.08 Email with Charl - SealTek Complaint.pdf
- 13.5 Add R 2019.10.08 Email with Quinton - voorlopige snag lysie Attach.pdf
- 13.6 Add U 2019.10.08 Photos taken on morning after Charls last day.pdf
- 13.7 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellatie van kontrak.pdf

14. Further issues

14.1 The Plaintiff did not take into account that there was a newborn at the premises.

- 14.1.1 Add E 2019.08.19 Email with Charl - RE_ Fw_ Huis Kleinbron



Eastae.pdf

- 14.1.2 Add I 2019.09.01 Email with Charl - 91 Frangipani.pdf
- 14.1.3 Add J 2019.09.04 Email with Charl - RE_ Waterproofing of 3 x decks.pdf
- 14.1.4 Add P 2019.10.08 Email with Charl - SealTek Complaint.pdf
- 14.1.5 Add Z 2019.10.13 Email with Charl - Re_ Fwd_ RE_ Aftrekkings.pdf
- 14.1.6 Add Y 2019.10.13 Email with Charl - Re_ Fwd_ RE_ Aftrekkings Sonet brief antwoord in rooi.-1.pdf
- 14.1.7 Add BB 2019.10.14 Email with Charl - RE_ Chris.pdf
- 14.1.8 Add JJ 2019.10.17 Email with Charl - Chris stofsuiet.pdf
- 14.1.9 Add MMM Datasheet - Polyfilla-interior (Safety).pdf

14.2 The Plaintiff failed to attend site regularly and failed to provide proper oversight over its employees

- 14.2.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 14.2.2 Add CCCC Photo Evidence.pdf
 - 14.2.2.1 Photograph 28
- 14.2.3 Add N 2019.10.04 Email with Charl - Fwd_ RE_ Werk sonder toesig.pdf
- 14.2.4 Add P 2019.10.08 Email with Charl - SealTek Complaint.pdf

14.3 Not skilled or semi-skilled workers

- 14.3.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf

15. Additional work

- 15.1 Add L 2019.09.27 Email with Quinton - Is daar enige ekstra kostes sover.pdf

15.2 Galvanised extractor

- 15.2.1 Add ZZZ SealTek - Vat Invoice 479.pdf

15.3 Boundary wall extra charge

- 15.3.1 Add ZZZ SealTek - Vat Invoice 479.pdf
- 15.3.2 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasië van kontrak.pdf

15.4 Joints unsightly

- 15.4.1 Add ZZZ SealTek - Vat Invoice 479.pdf
- 15.4.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 15.4.3 Add KKK 2020.09.21 Quantification Report.pdf
- 15.4.4 Add CCCC Photo Evidence.pdf
 - 15.4.4.1 Photograph 86
 - 15.4.4.2 Photograph 87
 - 15.4.4.3 Photograph 88
 - 15.4.4.4 Photograph 89
 - 15.4.4.5 Photograph 90
 - 15.4.4.6 Photograph 91
 - 15.4.4.7 Photograph 92
 - 15.4.4.8 Photograph 93
- 15.4.5 Add HH 2019.10.16 Email with Structural Engineer - RE_ Trappie.pdf
- 15.4.6 Add XXX Datasheet - Sikaflex.pdf

15.5 Manhole

- 15.5.1 Add ZZZ SealTek - Vat Invoice 479.pdf
- 15.5.2 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 15.5.3 Add KKK 2020.09.21 Quantification Report.pdf
- 15.5.4 Add CCCC Photo Evidence.pdf
 - 15.5.4.1 Photograph 94
 - 15.5.4.2 Photograph 95

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15.6 Plaster work above sliding door

- 15.6.1 Add ZZZ SealTek - Vat Invoice 479.pdf
- 15.6.2 Add CCCC Photo Evidence.pdf
 - 15.6.2.1 Photograph 96

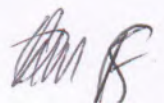
15.7 Plaster foundation walls

- 15.7.1 Add ZZZ SealTek - Vat Invoice 479.pdf
- 15.7.2 Add CCCC Photo Evidence.pdf
 - 15.7.3 Photograph 32

16. Claim A:

16.1 Unsightly joints

- 16.1.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf
- 16.1.2 Add KKK 2020.09.21 Quantification Report.pdf
- 16.1.3 Add CCCC Photo Evidence.pdf
 - 16.1.3.1 Photograph 86
 - 16.1.3.2 Photograph 87
 - 16.1.3.3 Photograph 88
 - 16.1.3.4 Photograph 89
 - 16.1.3.5 Photograph 90
 - 16.1.3.6 Photograph 91
 - 16.1.3.7 Photograph 92
 - 16.1.3.8 Photograph 93
 - 16.1.3.9 Photograph 52
 - 16.1.3.10 Photograph 53
 - 16.1.3.11 Photograph 54
 - 16.1.3.12 Photograph 55



16.1.4 Add HH 2019.10.16 Email with Structural Engineer - RE_ Trappie.pdf

16.2 Repairs

16.2.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf

16.2.2 Add KKK 2020.09.21 Quantification Report.pdf

17. Claim B:

17.1 Leaking tap

17.1.1 Add M 2019.10.02 Sms with Quinton re leaking tap.pdf

17.1.2 Add P 2019.10.08 Email with Charl - SealTek Complaint.pdf

17.1.3 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasië van kontrak.pdf

17.1.4 Add DDDD 2019.10.10 Kraan na Miguel hom reggemaak het.MOV

17.1.5 Add EEEE 2019.10.10 Kraan voor Miguel hom reggemaak het.MOV

17.2 Blinds

17.2.1 Add X 2019.10.10 Our response to items SealTek broke.pdf

17.2.2 Add CCCC Photo Evidence.pdf

17.2.2.1 Photograph 97

17.3 Lounge suite

17.3.1 Add P 2019.10.08 Email with Charl - SealTek Complaint.pdf

17.3.2 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasië van kontrak.pdf

17.3.3 Add W 2019.10.10 Email with Charl 2 - kussings.pdf

17.3.4 Add Z 2019.10.13 Email with Charl - Re_ Fwd_ RE_ Aftrekkings.pdf

17.3.5 Add Y 2019.10.13 Email with Charl - Re_ Fwd_ RE_ Aftrekkings Sonet brief antwoord in rooi.-1.pdf

17.4 Electrical cables

- 17.4.1 Add CCCC Photo Evidence.pdf
 - 17.4.1.1 Photograph 99
 - 17.4.1.2 Photograph 100

17.5 Jojo tank

- 17.5.1 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasi van kontrak.pdf

18. Removed the following:

18.1 Tap lock

- 18.1.1 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasi van kontrak.pdf

18.2 Hosepipe

- 18.2.1 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasi van kontrak.pdf

19. Used and broke:

19.1 Broom

- 19.1.1 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasi van kontrak.pdf

19.2 Pool net

- 19.2.1 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellasi van kontrak.pdf
- 19.2.2 Add X 2019.10.10 Our response to items SealTek broke.pdf

19.3 Hosepipe connector

- 19.3.1 Add M 2019.10.02 Sms with Quinton re leaking tap.pdf

19.4 Pool

- 19.4.1 Add P 2019.10.08 Email with Charl - SealTek Complaint.pdf

AK

19.4.2 Add FFFF 2019.10.30 Pool pipe leak.mp4

19.4.3 Add CCCC Photo Evidence.pdf

19.4.3.1 Photograph 101

19.4.3.2 Photograph 102

19.4.3.3 Photograph 105

19.4.3.4 Photograph 106

19.4.3.5 Photograph 107

19.4.3.6 Photograph 108

20. Claim C

20.1 Cleaning

20.1.1 Add LL 2019.10.19 sms with Quinton re cleaners.pdf

20.1.2 Add OO 2019.10.21-22 Email with Charl - Fwd_ Fianal account.pdf

20.2 Jojo overflow pipe

20.2.1 Add CCCC Photo Evidence.pdf

20.2.1.1. Photograph 103

20.2.1.2 Photograph 104

20.3 Solar heating pipes

20.3.1 Add FFFF 2019.10.30 Pool pipe leak.mp4

20.3.2 Add CCCC Photo Evidence.pdf

20.3.2.1 Photograph 105

20.3.2.2 Photograph 106

20.3.2.3 Photograph 107

20.3.2.4 Photograph 108

20.4 Rubble

20.4.1 Add CCCC Photo Evidence.pdf

- 20.4.1.1. Photograph 76
- 20.4.1.2 Photograph 77
- 20.4.1.3 Photograph 78
- 20.4.1.4 Photograph 79
- 20.4.1.5 Photograph 80

20.5 Grass

- 20.5.1 Add CCCC Photo Evidence.pdf
 - 20.5.1.1 Photograph 78
 - 20.5.1.2 Photograph 79
 - 20.5.1.3 Photograph 80

20.6 Tap leaking (water wastage)

- 20.6.1 Add M 2019.10.02 Sms with Quinton re leaking tap.pdf
- 20.6.2 Add V 2019.10.10 Email with Charl 1 - RE_ RE_ Kansellisie van kontrak.pdf
- 20.6.3 Add DDDD 2019.10.10 Kraan na Miguel hom reggemaak het.MOV
- 20.6.4 Add EEEE 2019.10.10 Kraan voor Miguel hom reggemaak het.MOV
- 20.6.5 Add X 2019.10.10 Our response to items SealTek broke.pdf

21. Independent building Consultant

- 21.1 Add JJJ 2020.09.21 Building Consultant Report 4821.pdf

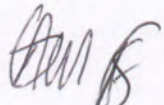
22. Additional Documents

- 22.1. Add C 2019.08.08 Email with Structural Engineer - Introduction.pdf
- 22.2 Add B 2019.08.08 Email with Quinton - Waterproofing quote.pdf
- 22.3 Add F 2019.08.19 Email with Quinton - Fw_ Huis Kleinbron Eastae.pdf
- 22.4 Add H 2019.08.30 Prinsloo & Zeeman - Waterproofing Report and Quote.pdf
- 22.5 Add D 2019.08.12 Email with Charl - P&Z quote fwd.pdf

- 22.6 Add O 2019.10.08 Email with Charl - Kansellasië van kontrak.pdf
- 22.7 Add T 2019.10.08 Email with SealTek Head Office - Kansellasië van kontrak.pdf
- 22.8 Add Q 2019.10.08 Email with MHI - Re_ Fwd_ Re_ Addendum.pdf
- 22.9 Add GG 2019.10.14 Email with Structural Engineer - sien asb aangeheg.pdf
- 22.10 Add FF 2019.10.14 Email with Structural Engineer - sien asb aangeheg 01 Francois.pdf
- 22.11 Add AA 2019.10.13 Email with Structural Engineer - RE_ 91 Frangipani.pdf
- 22.12 Add KK 2019.10.18 Photos taken on SealTeks last day.pdf
- 22.13 Add RR 2019.10.24 Email with Kobie - Customer Statement.pdf
- 22.14 Add TT 2019.10.29 Email from FPS - FPS SealTek Yourself.pdf
- 22.15 Add YY 2019.11.25 Email with FPS - RE_ SealTek to please sign attached form.pdf
- 22.16 Add ZZ 2019.11.27 Email with FPS and VVE - Cancel VVE.pdf
- 22.17 Add BBB 2020.03.11 Email with FPS - FPS Letter of demand.pdf
- 22.18 Add DDD 2020.03.19 Email from Abraham & Gross - HelloPeter posts Attach.pdf
- 22.19 Add EEE 2020.03.19 Email from Abraham & Gross - HelloPeter posts.pdf
- 22.20 Add III 2020.05.21 Email with FPS - FPS Sealtek Cape (Pty) Ltd.pdf
- 22.21 Add QQQQ 2019.11.21 Settlement with previous owners of house.pdf
- 22.22 Add RRRR 2019.11.22 HelloPeter Review SealTek Cape.pdf

23. Pleadings and Notices

- 23.1 All pleadings and notices filed in the Magistrates court for the district Kuils River under the case number 863/2020



SCHEDULE ONE

Part Two

1. Correspondence between attorney and client, and correspondence between Counsel, attorney and client, containing communication of a confidential nature with the object of obtaining legal advice in relation to the matter in question in this action prior to and in contemplation of and during the continuance of these proceedings.

Am B