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**THE REPUBLIC OF TRINIDAD AND TOBAGO**

**IN THE HIGH COURT OF JUSTICE**

Claim #2010-04767

Between

**SUMATEE LATCHMAN**

**Claimant**

**AND**

**KHALILAH ABDAL ADIL Defendant**

**Response to the Affadavit in Reply**

I, SUMATEE LATCHMAN, of Corner Allick Terrace, and Bagatelle Road, Diego Martin in the Island of Trinidad make oath and say as follows:

1. The facts deposed herein are true and correct and within my personal knowledge except where based on information and belief in which case I verily believe the same to be true and correct
2. I join issues with the Defendant upon his Defence save in so far as the same consists of admissions and save for any admissions contained herein.
3. I have read what purports to be true copy of the Affadavit of the Defendant Khalilah Abdal Adil, (hereinafter Respondent’s affidavit in reply,) which said affidavit was filed with the Honorable Court on 7th of December, 2010 and I depose this affidavit in response.
4. In respect to paragraph 13 of Respondent’s affidavit in Reply, I have never let the trees or the stuff against the chain link fence for it to lean over her yard. I used to have a small pompek pup which never damaged anything. I do not know whether the pup defecated over her yard since she never complained of it. The Pup since died even before the Wall was built.
5. In response to paragraph 14 of her affidavit, I admit that my husband and I used to have arguments but never loud enough to disturb the neighbours. However, since my husband and I were divorced my Husband left the premises.
6. In response to paragraph 19, I deny that they have marked the spot where the chain link fence had stood. They took down the chain link fence in sections.
7. I have also warned them that they are building in my yard and encroaching into my yard. The builders completely ignored me.
8. In response to paragraph 20 I deny that they refilled the the trench. The wall was built in my yard.

In these circumstances I humbly pray that the court gives me the relief I sought .

Sworn to at }

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This day of }

2012 }