

FORM 6

**IN THE INDUSTRIAL COURT OF THE REPUBLIC OF BOTSWANA
HELD AT GABORONE**

Case No. _____

IN THE DISPUTE BETWEEN

APPLICANT: _____

And

RESPONDENT: _____

APPLICANT'S FOUNDING AFFIDAVIT
(in terms of Rule 29(2)(b))

I the undersigned

(state the names of the person who will sign the affidavit)

do hereby take oath and swear that:

1. Unless the contrary is expressly stated or the context otherwise suggests, all the matters herein pleaded are within my personal knowledge and information and are true and correct to the best of my information.
2. I am an adult male/female of full legal capacity residing at (state place of residence). I am employed at _____ / I am unemployed. My address for the purposes of this action is (state the applicant's postal address/that of the representative of the applicant.

THE PARTIES

3. The applicant is _____ an adult male/female of full legal capacity residing at (state place of residence). The applicant is employed at _____ / the applicant is

unemployed. His/her address for the purposes of this action is _____ (state the postal and physical address of the applicant or her representative).

4. The respondent is (state name of respondent) _____,
[A] an adult male/female of full legal capacity residing at (state place of residence), OR
[B] a company registered under the laws of Botswana. The company's head office is at _____ and the company's address is _____ OR
[C] the Government of Botswana, sued in its capacity as the employer. The responsible ministry is the Ministry of

THE PURPOSE OF THE APPLICATION

5. The purpose of the present application is to seek and obtain an order that:

(Here set out what relief you want from the Court)

THE FACTUAL BACKGROUND

6. _____

(Here, state all the relevant facts of the case. The facts must be divided into paragraphs and must be in the order in which they happened. If there are any documents which support your case, they must be indicated in this portion and the documents must be attached to the affidavit).

THE APPLICANT'S COMPLAINTS

7. _____

(Here, state all the complaints which the applicant has against the conduct of the respondent in view of the background of the relevant facts of the case as already outlined, e.g. the applicant may complain that the conduct of the respondent is unlawful, or unfair, and the reasons must be stated clearly).

CONCLUSION

8. On the basis of all the foregoing, the applicant prays for an order in terms of the draft order.

DEPONENT

**SIGNED AND SWORN TO BEFORE ME, THE DEPONENT HAVING
ACKNOWLEDGED THAT HE/SHE KNOWS AND UNDERSTANDS THE
CONTENTS OF THIS AFFIDAVIT.**

COMMISSIONER OF OATHS

Full names: _____

Rank: _____

Date: _____

Place: _____

Time: _____