

COURT OF QUEENSLAND

REGISTRY:

NUMBER: OF 2003

PLAINTIFF:

AND

DEFENDANT:

AFFIDAVIT

I, of **Wayne Eric White** of 8 Conlon Street Roma, in the State of Queensland, on the, 28 August 2003 make oath and say as follows:

AFFIDAVIT OF

Wayne Eric White

(Filed on behalf of

(Sworn this
day of

Tel:
Fax:

1. I am Registered Builder in the State of Queensland and conduct a business – Wayne White Builders at Roma, Queensland.
2. During the past 43 years I have been involved in the building industry in various facets, including Clerk of Works for the Queensland Government, a qualified building Inspector registered with the Building Services Authority and registered Builder.
3. As a result of this I have a wide experience in the examination of all classes of building and structures.
4. Following instructions received from Statewide Security Consultants and Service of Brisbane on the 5 March 2003 I went to the Blackall Historical Village located at Ram Park Blackall on the 7 March 2003 where I conducted a thorough search of a relocated building which I understand had been relocated from Yalleroi a couple of years earlier and placed in the park.
5. I recognised the building here was of a similar type as Government State

SHEET 1

Wayne White
Deponent



School buildings common to country areas in Queensland dating back to the early fifties at least.

6. I observed that it consisted of a main classroom with front and back enclosed verandahs with the front stairs being relocated to the side instead of the centre, having been partly enclosed, as was the rear verandah adjacent to the enclosed storeroom.
7. My instructions were to carry out a thorough examination of the building, but in particular to inspect the timber wall between the main classroom and the rear-enclosed verandah, which I am led to believe, was used as a library/office previously.
8. I firstly measured the main classroom, which I found was 5.5metres deep and 6.4metres wide. The back verandah and storeroom was 2.4metres deep by 6.4metres wide.
9. I subsequently prepared from my notes and measurements taken at the time a floor plan of the General Layout of the whole building. Marked WW 1 and annexed hereto.
10. At the same date I personally took a number of colour photographs, which were duly processed.
11. This is a copy of a photograph of the main classroom, which depicts the floor, rear wall and adjoining rear verandah. Marked WW 2 and annexed hereto.
12. The back wall of the main teaching area is constructed of VJ Pine Lining and Belt Rails measuring 100 by 50 millimetres situated on the verandah side. After a thorough examination I found no imperfections that would give visual access from the main classroom to the verandah side or likewise. I found that the D mould cover strip had been replaced with a smaller D mould cover strip on the inside wall in the classroom. Evidence of this being paint markbuildup on the

SHEET 2

Wayne White
Deponent



VJ lining of the wall.

13. This is a copy of a Elevation Plan D prepared by me and depicts the Library side of the wall and the belt rails and stud in place. This timber is the original wall. Likewise there is no evidence of any imperfection or board replacements Marked WW3 and annexed hereto.
14. This is a copy of a photograph of the rear wall of the main teaching area taken from the back verandah side. It depicts the belt rails and the composition of the wall. Marked WW4 and annexed hereto.
15. I can unreservedly say from my inspection that no rectification work of this wall has been carried out since being originally constructed. It is the original wall of the school building and there is nothing available to suggest otherwise.
16. I prepared a plan depicting the construction of the wall showing different heights of belt rail and D mould cover strip. This indicates that no holes or imperfections have been covered up by either belt rail or D mould. Marked WW5 and annexed hereto.
17. This plan also depicts a cross section of VJ Tongue and Groove lining to scale. No evidence of any VJ board replacements is evident. Marked WW6 and annexed hereto.
18. An important aspect of these being the original VJ Tongue and Groove boards is the continuation of the horizontal build up of paint over the years clearly shows no replacement of any boards in the wall.
19. As a result of my examination and expertise I can state categorically that there is no evidence of a hole ever existing in the wall between the main classroom and the library verandah.

SHEET 3

Deponent *Wayne White*



Solicitor/A. Justice of the Peace

All the facts and circumstances herein deposed to are within my own knowledge save where same are deposed to from information only and my means of knowledge and sources of information appear on the face of this Affidavit.

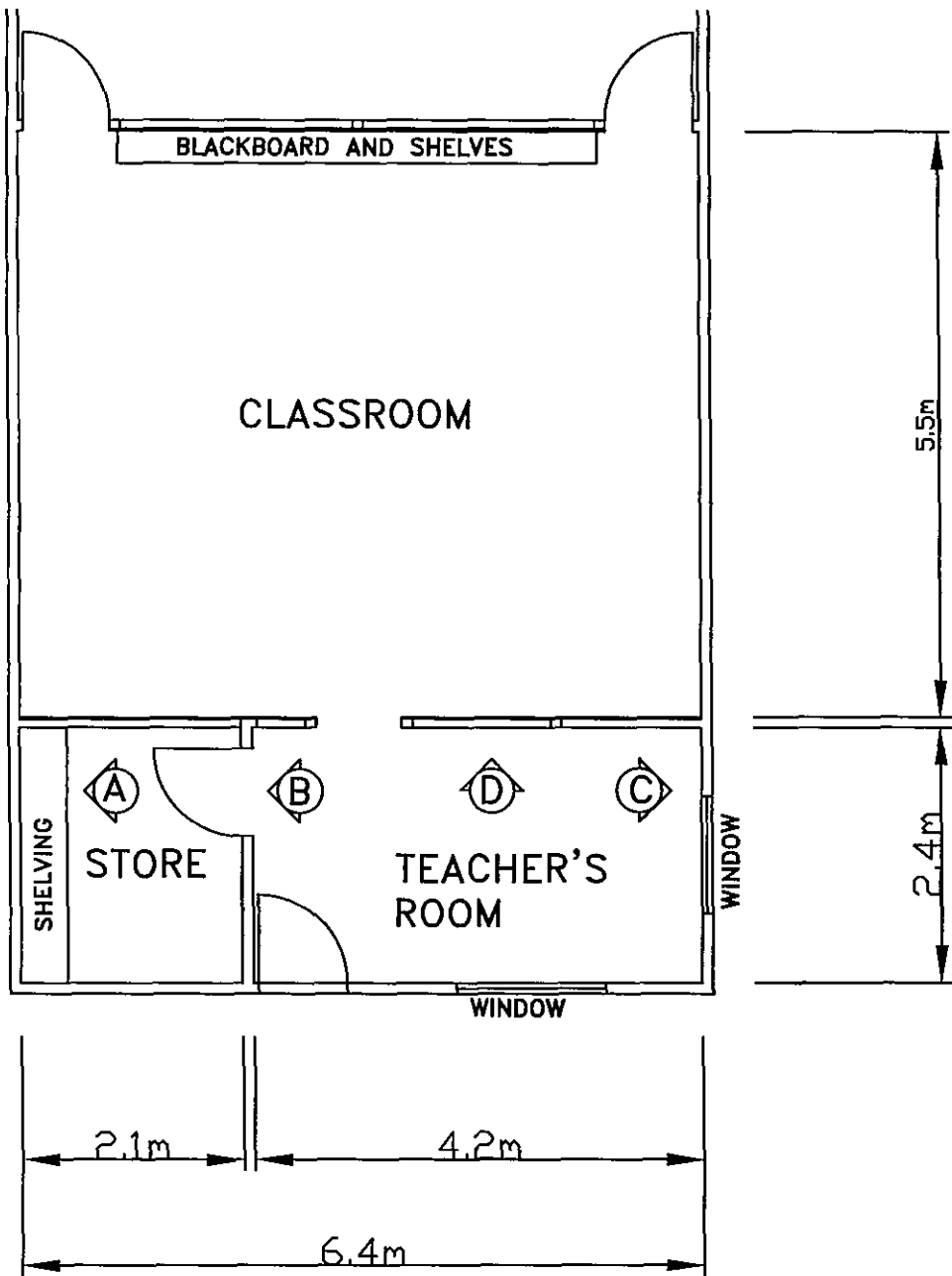
Wayne White

SWORN by the above named Wayne Eric White)
Deponent at Roma)
This Twenty Eighth day of August 2003)
before me)



Wayne White
Deponent





GENERAL LAYOUT

SCALE 1:50 (A4)

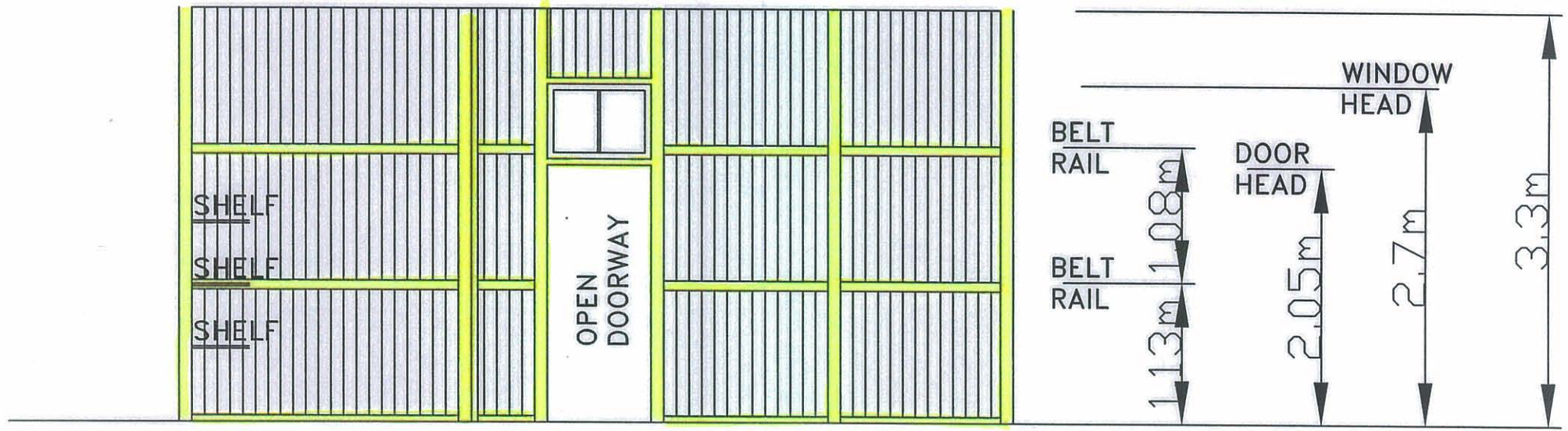
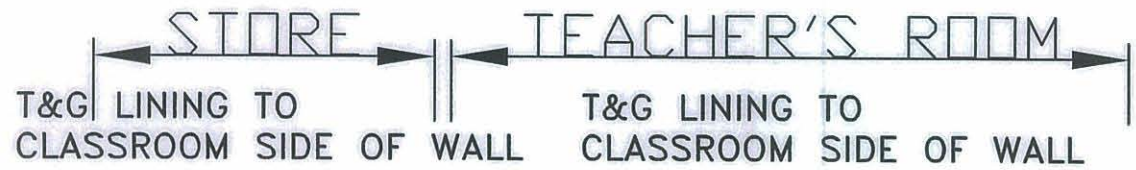
YELLARROY STATE SCHOOL
PARTIAL FLOOR LAYOUT

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DATE 09/07/03
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SCALE 1:100(A3)

KITTEN DRAFTING SERVICE
1 DOWNS ST, ROMA
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ELEVATION (D) SCALE 1:33.33

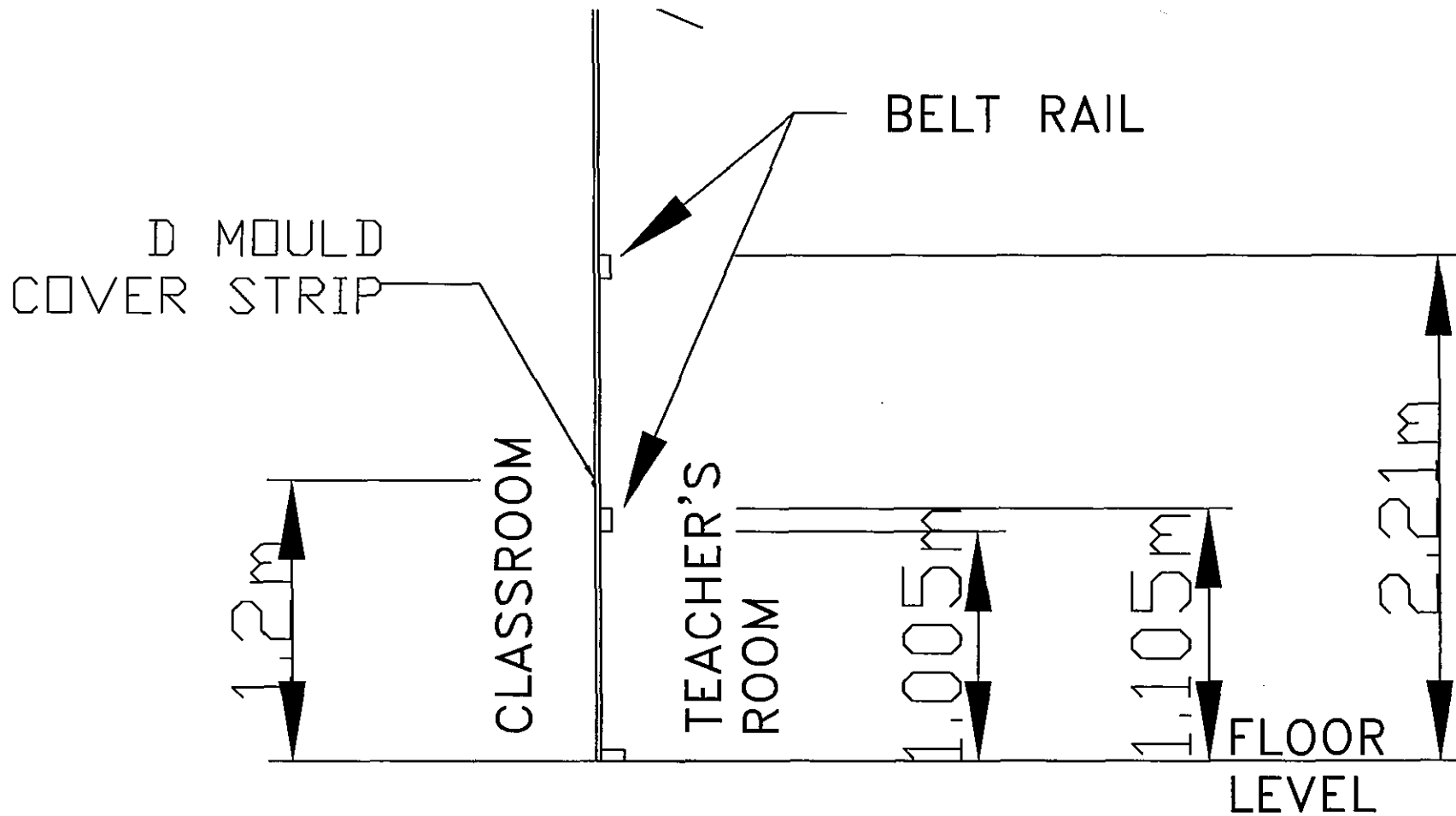
YELLARROY STATE SCHOOL
PARTIAL FLOOR LAYOUT

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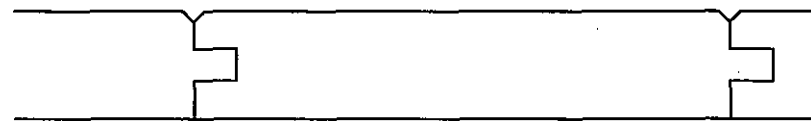
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SECTION TEACHER'S ROOM TO CLASSROOM WALL

SCALE 1:20



T&G SECTION SCALE 1:2

YELLARROY STATE SCHOOL
PARTIAL FLOOR LAYOUT

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