



U L R I C H R O U X

AND ASSOCIATES

Our reference: UR/VF/MU2206

Your reference:

01 June 2023

URGENT

FOR THE ATTENTION OF : STEPHEN PATRICK SOLE

PER EMAIL : sams@amabhungane.org

Dear Sir

RE: MAZETTI MANAGEMENT SERVICES (PTY) LTD AND ANOTHER // AMABHUNGANE CENTRE FOR INVESTIGATIVE JOURNALISM NPC AND OTHERS

1. We refer to the above matter as well as our clients' urgent *ex parte* application which is herewith served on you.
2. In our clients' founding affidavit at paragraphs 12.3 to 12.4 thereof, your attention is drawn to the fact that our clients intend to make use of a confidential affidavit.
3. The purpose of the confidential affidavit is to enable the Court to consider documentation which our clients contend is confidential, without disclosing that information as a matter of public record.
4.
 - 4.1. You are obviously entitled to an opportunity to consider all the evidence upon which our clients rely and to the benefit of legal advice thereon.

Johannesburg Head Office:

Ground Floor | 15 Chaplin Road | Illovo | Sandton | 2196
+27 (0) 11 455 4640 | info@rouxlegal.com | www.rouxlegal.com

Cape Town:

First Floor | Block A | 7 West Quay | West Quay Road | V&A Waterfront | 8001
+27 (0) 21 001 5192 | info@rouxlegal.com | www.rouxlegal.com

Registration Number 2018/054794/21

Directors: Ulrich Andre Roux B.Com Law, LLB | Vanessa Da Silva Faria Fernihough LLB (Cum Laude) | Casper HJ Badenhorst LLB, LLM
Senior Associates: JP Venter LLB | Storm Barry LLB (Cape Town)
Associates: Clarisa Vermaak LLB | Geri Erasmus LLB | Cameron Phillips B.Com LLB | Matthew Temlett LLB
Consultant: Ian Small-Smith B.Proc



- 4.2. Our clients do not wish to deprive you of that opportunity, but at the same time the documents attached to our clients' confidential affidavit are confidential and proprietary to it and if shared with third parties and/or any members of the public our clients' interests will be prejudiced.
5.
 - 5.1. The mechanism is well recognised and has been described as a "useful expedient" for balancing our clients' interests in retaining the confidentiality thereof with your right to consider the documentation and obtain legal advice thereon in an unfettered manner.
 - 5.2. The only constraint on you is against disclosure of this information, something which does not infringe upon any of your rights as a litigant.
6. If you oppose the application and appoint attorneys, then the confidential affidavit will be made accessible to you and your attorneys if you and your attorneys provide the following undertakings:
 - 6.1. you and your attorneys will keep the contents of the confidential affidavit confidential and will not disclose the confidential affidavit and the content thereof to anyone else (save to your legal representative and strictly for the purpose of giving instructions thereon); and
 - 6.2. no copies or duplicates (by any other means) of the confidential affidavit or the documents attached thereto will be made or retained by you and/or your appointed attorneys and all copies and/or duplicates of the documents shall be returned to us at the close of proceedings in this matter.



7. If you fail and/or refuse to give the above undertakings, which are the basis on which the confidential affidavit is tendered to you, for you to be fairly able to answer the content thereof without compromising our clients' submissions as to confidentiality, our clients will nonetheless seek the leave of the Court to rely on the contents thereof.
8. Kindly draw this letter to your attorney's attention and provide us with the requested undertakings so that our clients can make its confidential affidavit accessible to you without delay.

Yours faithfully

A handwritten signature in black ink, appearing to read 'V. da Silva', enclosed within a large, loopy oval scribble.

VANESSA DA SILVA FARIA FERNIHOUGH | DIRECTOR

ULRICH ROUX & ASSOCIATES