

WEBBER WENTZEL

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The Honourable Deputy Chief Justice Zondo
Chairman of the Judicial Commission of Inquiry into Allegations
of State Capture, Corruption and Fraud in the Public Sector
including Organs of State ("the Commission")

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Your reference	Our reference	Date
	D Milo / L Pillay / K Mavuso 3029081	28 February 2020

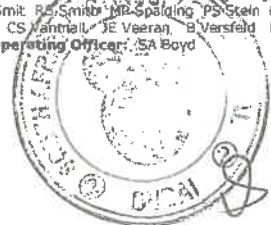
CONFIDENTIALITY NOTE: This letter contains confidential information intended only for the person/s to whom it is addressed. Any other recipient is not entitled to read the rest of this letter or disclose its contents to any person, or take copies, and is requested to notify us immediately by fax, e-mail or telephone at the numbers listed above and we will reimburse the costs of doing so.

Dear Deputy Chief Justice

Notice in terms of Rule 3.3

- As you are aware, we act for MultiChoice Group Ltd and their Mr Calvo Mawela, Ms Clarissa Mack and Mr Imtiaz Patel ("our clients").
- We refer to the evidence presented to the Commission by Mr Yunus Carrim on 25 February 2020 ("the Carrim evidence") as well as the evidence presented by Ms Lulama Mokhobo on 26 February 2020 ("the Mokhobo evidence"), in respect of which our clients received Rule 3.3 notices.
- We note that during both the Carrim evidence and the Mokhobo evidence, various other documents and information ("documents") were referred to in the context of evidence concerning our clients. These documents are:

Senior Partner: JC Els Managing Partner: SJ Hutton Partners: BW Abraham RB Africa M Adderley NG Aip RL Appelbaum DC Bayman KL Baillings AE Bennett AP Blair DHL Bogysen AR Bowley MS Burger RI Carrim T Cassim SJ Chong A Chrisbe KL Collier KM Colman KE Coster K Couzyn OB Cron PA Crostland JH Davies PM Daya L de Bruyn PU Dela JHB de Lange M Denenga DW de Villiers BEC Dickinson MA Diemont DA Dingley G Driver W Druce HD du Preez CP du Toit SK Edmundson KH Eisler AE Esterhuizen MJR Evans AA Feleks G Fitzmaurice JB Forman C Gabriel CP Gaul KL Gawith OH Goldenhuys MM Gibson H Goolam CI Gouws PD Grealy JM Harvey MH Hathorn JS Henning KR Hillis S Hockey CM Hoffeld PM Holloway AV Ismail ME Jarvis CA Jennings CM Jonker S Jooste LA Kahn ACR Katzke M Kennedy A Keyser MD Kota JC Kraamwinkel M Kyle J Lamb E Louw L Marais S McCafferty MC McIntosh SJ McKenzie CS Meyer AJ Mills D Milo NP Mngomezulu M Moloi LE Mostert VM Movshovich RA Nelson G Niven ZN Ntshona M Nxumalo AN Nyatsumba L Odendaal GJP Olivier N Paine AMH Terdin AS Parry S Patel GR Penfold SE Phajane BA Phillips MA Phillips D Ramjattan GI Rapson Z Rawoot K Rew SA Ritchie NIA Roubé DC Ruitman W Rysbergen G Sader M Sader H Samsodien JW Scholtz KE Shepherd AJ Simpson N Singh N Singh-Nogueira P Singh J Smit B Smit MP Spalding PS Stein MW Straeul LJ Swaine Z Swanepoel A Thakor TK Thekiso PZ Vanda PP van der Merwe SE van der Meulen CS Vantail JE Veeran B Versfeld MG Versfeld TA Versfeld DM Visagie EME Warmington J Watson AWR Westwood RH Wilson M Yudaken **Chief Operating Officer: SA Boyd**



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Page 2

- 3.1 the supplementary affidavit of Mr Yunus Carrim;
 - 3.2 the affidavit of Ms Theresa Geldenhuys including minutes of SABC board meetings which appear to be attached to this affidavit (including minutes of the SABC board meeting of 2 July 2013);
 - 3.3 the affidavit of Mr Krish Naidoo;
 - 3.4 the affidavit by Prof Cecil Petros Lawrence;
 - 3.5 the affidavit of Ms Lindiwe Vuyelwa Bayi;
 - 3.6 the affidavit of Mr Tiaan Olivier; and
 - 3.7 the audio recording of the meeting held on 6 June 2013 between the interim board of the SABC and our clients. While a minute of this meeting is attached as annexure 3 to the affidavit of Mr Carrim (which has been provided to our clients), it is clear from the omissions and gaps in the minute (indicated for instance by the insertion of "???" throughout the minute) that this is not an official or accurate transcription of the full meeting. Our clients wish to consider the audio recording itself.
4. Our clients request that the above documents be provided to them, as well as the transcripts of the Carrim and Mokhobo evidence (which we note are not available on the website of the Commission), in order to fully and comprehensively respond to the allegations made against it before the Commission.
 5. In addition, our clients reserve the right to request any further documents which may be referred to in the affidavits mentioned above once these have been received and considered by our clients.
 6. We look forward to receiving these documents.
 7. All our clients' rights remain reserved.

Yours faithfully

WEBBER WENTZEL

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CPM