

**IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG LOCAL DIVISION, JOHANNESBURG**

**CASE NO: 26339/21
SCA:581/23
CCT 267/23**

In the matter between:

**LEON AMOS SCHREIBER
THE DEMOCRATIC ALLIANCE**

**First Applicant
Second Applicant**

And

THE AFRICAN NATIONAL CONGRESS

Respondent

CONFIRMATORY AFFIDAVIT

I, the undersigned,

LUNGI MTSHALI

do hereby make oath and say that;

1. I am an adult male and was the coordinator in the office of the Deputy Secretary General duly employed by the Respondent.
2. I am duly authorised to depose this affidavit in light of it being a confirmation of the facts stated the affidavit of Fikile April Mbalula and I swear positively to the facts as far as they are related to me.
3. As a result of the foregoing the facts herein contained are within my own personal knowledge and belief and are true and correct and I am duly authorised to depose to this affidavit.

*FA
LM
mw*

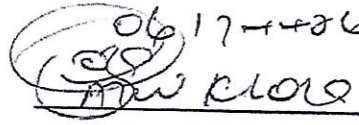
4. The Deployment Committee meetings during that period were not convened like meetings of a structure. It met to receive reports from comrades in government and make recommendations.
5. There were no decisions taken on behalf government that needed to be followed up or whose implementation had to be monitored and were no deployment committee reports to the NEC/NWC.
6. I confirm that there are no record that I'm aware of that were kept and filed by the office of the Deputy Secretary General.
7. I confirm that any documents related to the Deployment Committee were in the laptop that I used at the time and returned to IT in 2018.
8. Attached to this affidavit is my email confirming my stance sent to Mrs Febe Potgieter marked as annexure "LM1".



 DEPONENT

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, WHICH WAS SIGNED AND SWORN BEFORE ME AT Pretoria ON THIS THE 19 DAY OF February 2024, THE REGULATIONS CONTAINED IN GOVERNMENT NOTICE NO R1258 OF 21 JULY 1972, AS AMENDED, AND GOVERNMENT NOTICE NO R1648 OF 19 AUGUST 1977, AS AMENDED, HAVING BEEN COMPLIED WITH.

BRYNTIRION
 PROTECTION AND SECURITY SERVICES
 2024 -02- 19
 PROTECTION AND SECURITY SERVICES
 PRETORIA
 SOUTH AFRICAN POLICE SERVICE

06174486


 COMMISSIONER OF OATHS

FULL NAMES: Michael Clow
 DESIGNATION: WTO
 AREA: PRETORIA
 ADDRESS: PSS Bryntirion Estate
Arceles



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LEON AMOS SCHREIBER
THE DEMOCRATIC ALLIANCE

First Applicant
Second Applicant

And

THE AFRICAN NATIONAL CONGRESS

Respondent

CONFIRMATORY AFFIDAVIT

I, the undersigned,

THAPELO MASILELA

do hereby make oath and say that;

1. I am an adult male strategic support manager in the office of the Deputy Secretary General duly employed by the Respondent.
2. I am duly authorised to depose this affidavit in light of it being a confirmation of the facts stated the affidavit of Fikile April Mbalula and I swear positively to the facts as far as they are related to me.
3. As a result of the foregoing the facts herein contained are within my own personal knowledge and belief and are true and correct and I am duly authorised to depose to this affidavit.
4. On or about June 2023 my laptop which contained information in relation to the Deployment Committee crashed and a lot of data which was stored on that hard drive had been lost.

CM

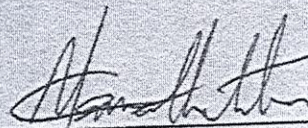
FA

5. Despite numerous efforts to retrieve the data from this laptop's hard drive, I was unable to retrieve everything as at 18 February 2024 and therefore do not have in my possession any other information for the period in question other than what appears in the affidavit to which this affidavit is annexed.
6. During 2023, my personal email which I used for the Deployment Committee was full. In an attempt to free up space, I sorted sent emails by size and deleted majority of the big files. A number of emails which relate to the Deployment Committee were included.



DEPONENT

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, WHICH WAS SIGNED AND SWORN BEFORE ME AT Johannesburg ON THIS THE 19 DAY February OF 2024, THE REGULATIONS CONTAINED IN GOVERNMENT NOTICE NOR1258 OF 21 JULY 1972, AS AMENDED, AND GOVERNMENT NOTICE NOR1648 OF 19 AUGUST 1977, AS AMENDED, HAVING BEEN COMPLIED WITH.



COMMISSIONER OF OATHS

FULLNAMES: _____
DESIGNATION: _____
AREA: _____
ADDRESS: _____

CHRISTOPHER MAMATHUNTSHA
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F.A.

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Second Applicant

And

THE AFRICAN NATIONAL CONGRESS

Respondent

CONFIRMATORY AFFIDAVIT

I, the undersigned,

DESMOREEN CAROLUS

do hereby make an oath and say that;

1. I am an adult female and was the coordinator in the office of the Secretary General duly employed by the Respondent.
2. I am duly authorised to depose this affidavit in light of it being a confirmation of the facts stated the affidavit of Fikile April Mbalula and I swear positively to the facts as far as they are related to me.
3. As a result of the foregoing the facts herein contained are within my own personal knowledge and belief and are true and correct and I am duly authorised to depose to this affidavit.

C.M
D.C

F.A.

4. I worked in the office of the Secretary General ("the SGO") from October 2008 to the end of October 2016, whereupon I moved to the ANC Policy Institute until April 2018.
5. I wish to confirm and state under oath that servicing the Deployment Committee was not part of my daily duties during my time at the Secretary General's Office.
6. This function was delegated to the Deputy Secretary General and it never came across my desk in any form.
7. I do not recall minutes of the Deployment Committee being referred to in the workings of the Secretary General's Office whilst I was there.
8. I confirm that I never saw a written document purporting to be minutes of the Deployment Committee, covering the period when I was part of the Secretary General's Office.
9. Attached to this affidavit is my email confirming my stance sent to Mrs Febe Potgieter marked as annexure "DC1".

[Handwritten Signature]

DEPONENT

I HEREBY CERTIFY THAT THE DEPONENT HAS ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, WHICH WAS SIGNED AND SWORN BEFORE ME AT Johannesburg ON THIS THE 19 DAY OF February 2024, THE REGULATIONS CONTAINED IN GOVERNMENT NOTICE NO R1258 OF 21 JULY 1972, AS AMENDED, AND GOVERNMENT NOTICE NOR1648 OF 19 AUGUST 1977, AS AMENDED, HAVING BEEN COMPLIED WITH

[Handwritten Signature]

COMMISSIONER OF OATHS

FULL NAMES: _____

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F.A.