

"AJ1"

Andri Jennings

From: Andri Jennings
Sent: 13 April 2022 02:21 PM
To: Boitumelo Moti; NKirby@werksmans.com; Raisah O Mahomed
Cc: Tumi Modubu; Matthew Scorgie; Senzo Mbatha; Irene Pienaar
Subject: ORGANISATION UNDOING TAX ABUSE NPO//SOUTH AFRICAN NATIONAL ROADS AGENCT LTD, MINISTER OF TRANSPORT, NAZIR ALLI, DANIEL MOTAUNG, SKHUMBUZO MACOZOMA AND N3 TOLL CONCESSION (RF) (PTY) LTD (32095/2020) - OUT003
Attachments: LETTER TO ENS AND WERKSMANS 13.04.2022.pdf

Good day.

Kindly find attached hereto a letter for your kind attention.

Kind Regards/Vriendelike Groete,
Andri Jennings
Director/Direkteur



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JENNINGS
INCORPORATED

ATTORNEYS, NOTARIES, CURIA ADVISORIS & COURT COMMISSIONERS

OUR REFERENCE: A JENNINGS/OUT003
YOUR REFERENCE: CASE NUMBER: 32095/2020
DATE: 13 April 2022

TO: WERKSMANS ATTORNEYS

BY EMAIL: Boitumelo Moti bmoti@werksmans.com and Neil Kirby NKirby@werksmans.com and Raisah O Mahomed romahomed@werksmans.com

AND TO: EDWARD NATHAN SONNENBERGS

BY EMAIL: Tumi Modubu tmodubu@ensafrika.com and Matthew Scorgie mscorgie@ensafrika.com and Senzo Mbatha smbatha@ensafrika.com

Sirs

ORGANISATION UNDOING TAX ABUSE NPO//SOUTH AFRICAN NATIONAL ROADS AGENCT LTD, MINISTER OF TRANSPORT, NAZIR ALLI, DANIEL MOTAUNG, SKHUMBUZO MACOZOMA AND N3 TOLL CONCESSION (RF) (PTY) LTD (32095/2020)

1. We refer to the abovementioned matter.
2. We confirm, as you are aware, that we act on behalf of the Applicant – Organisation Undoing Tax Abuse NPO (herein referred to as our “client”) in the abovementioned matter.
3. We confirm that we have considered the content of the two Answering Affidavit’s as served on behalf of your respective clients and in view of the tender for certain documents as contained therein, we now request that you provide us with copies of the documents so tendered for our client to peruse.
4. We request copies of the following (as referred to in Paragraph 12 and 29 – 33 in the Answering Affidavit by the 6th Respondent):
 - 4.1 Concession Agreement.
 - 4.2 All annexures, amendments and addenda to the Concession Agreement.
 - 4.3 The contracts entered into with the independent engineer/s related to the Concession Agreement.
 - 4.4 The independent engineer/s reports submitted to SANRAL related to the Concession Agreement.

5. We confirm that we shall accept receipt via electronic transmission and suggest the WeTransfer platform for this purpose.
6. We trust that the above is in order and await your soonest reply herein.

TRANSMITTED ELECTRONICALLY AND UNSIGNED

Kind regards,
Andri Jennings
Director

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