

**IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION, PRETORIA**

CASE NUMBER: 7954/2021

In the matter between:

ORGANISATION UNDOING TAX ABUSE NPC

APPLICANT

and

SOUTH AFRICAN NATIONAL ROAD AGENCY LTD

1ST RESPONDENT

**SKHUMBUZO MACOZOMA N.O
(in his capacity as Information Officer)**

2ND RESPONDENT

SUPPLEMENTARY AFFIDAVIT

I, the undersigned

ANDRI JENNINGS

(Identity Number: 8804050112082)

Do hereby declare under oath as follows:

1.

- 1.1. I am an adult female legal practitioner- attorney employed at Jennings Incorporated, situated at 149 Anderson Street, Brooklyn, Pretoria, Gauteng Province. We are the attorneys of record on behalf of the Applicant being the Organisation Undoing Tax Abuse NPC.



1.2. By virtue of the appointment and instructions received from the Applicant I am duly authorized to depose to this affidavit.

1.3 The facts contained in this affidavit fall within my personal knowledge and belief, except where the contrary clearly appears from the context or where otherwise stated and are true and correct.

2.

THE PURPOSE OF THIS AFFIDAVIT

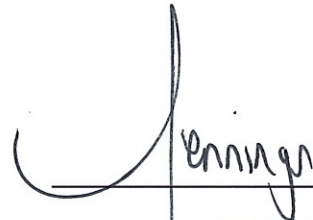
2.1 In light of perusal of the answering affidavit and further clarification in the Respondent's Heads of Argument, the defence sought to be raised by the 1st Respondent (SANRAL) relating to the human error made the staff of the SANRAL, the attached correspondence marked ANNEXURE "AD1 – AD3" reflects that the attorneys of record at the time, indicate that the matters will not be opposed and further reflects the desitinction between the matters.

2.1.1 On 20 November 2020, Mr Brendan Slade, the Legal Project Manager of OUTA forwarded the attached correspondence marked ANNEXURE "AD2", in respect of the pending PAIA applications to myself.

2.2 Further argument will be presented to the court that SANRAL was aware of the distinction on or about 19 November 2020, as it would have instructed its attorney accordingly in respect of the separate matters and as reflected in the correspondence.

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We shall seek indulgence from the court to allow the filing of this supplementary affidavit as it is in the interest of justice as well as having all the relevant facts placed before the court to adjudicate the matter.


DEPONENT

SIGNED AND SWORN TO BEFORE ME AT Pretoria ON THIS THE 15th
DAY OF July 2022, THE DEPONENT HAVING ACKNOWLEDGED THAT THE
DEPONENT KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, HAS
NO OBJECTION TO TAKING THE PRESCRIBED OATH AND CONSIDERS THE OATH
BINDING ON THE DEPONENT'S CONSCIENCE AND UTTERED THE WORDS "SO HELP
ME GOD".

COMMISSIONER OF OATHS

CAPACITY:

FULL NAMES:

PHYSICAL ADDRESS:

BERNARD BEZUIDENHOUT
KOMMISSARIS VAN EDE
COMMISSIONER OF OATHS
PRAKTISERENDE PROKUREUR R.S.A
PRACTISING ATTORNEY R.S.A
149 ANDERSON STREET
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