

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

Case Number: 2025-125365

In the matter between:

**ORGANISATION UNDOING TAX ABUSE NPC**  
(Registration number: 2012/064213/08)

Plaintiff

And

**HELEN MARGARET BOTES**  
(ID number: [REDACTED])

First Defendant

**CITY OF JOBURG PROPERTY COMPANY SOC LTD**  
(Reg number: 2000/017147/07)

Second Defendant

**CITY OF JOHANNESBURG METROPOLITAN  
MUNICIPALITY**

Third Defendant

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**NOTICE OF INTENTION TO DEFEND**

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**TAKE NOTICE THAT** the First Defendant hereby gives notice of his intention to defend the Plaintiff's action.

**TAKE FURTHER NOTICE THAT** the First Defendant hereby appoints the address of his attorneys, **KAKA AND KAKA ATTORNEYS**, set out below, as the address where he will accept service of any further process herein.

**TAKE FURTHER NOTICE THAT** the First Defendant is prepared to accept service of all subsequent pleading and notices in the action in a manner other than physical or postal address, with their preference being service via electronic mail to [REDACTED] and [REDACTED]

**TAKE FURTHER NOTICE THAT** the First Defendant hereby requests that the Plaintiff deliver consent in writing to the service by all parties of all subsequent documents and notices in the action by electronic mail.

**BE PLEASED TO TAKE NOTICE THAT** the First Defendant hereby gives notice of his intention to defend the above action and have appointed the address of its attorneys below as the address at which it will accept service of all further process and documents herein.

Dated at JOHANNESBURG this 27<sup>th</sup> day of **AUGUST 2025**.



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**KAKA AND KAKA ATTORNEYS INC**

Attorneys for the First Defendant

40 Crous Drive, Helderkrui

Roodepoort

1734

Tel: 011 766 1037

Email [REDACTED]

Ref: Mr. F. Kaka/ Helen Botes

**C/O Mahmood Mia Attorneys**

77 Altham Road, Robertsham

Johannesburg

2091

Email [REDACTED]

Tel: 011 834 6337

AND TO:

**THE REGISTRAR OF THE ABOVE HONOURABLE COURT**

**JOHANNESBURG**

AND TO:

**PLAINTIFF'S ATTORNEYS**

Jennings Incorporated

222 Smit Street

21<sup>st</sup> Floor

Bramfontein

Johannesburg

Tel: 012 110 4442

Email: [REDACTED]

Ref: A JENNINGS/OUT038

AND TO:

**SECOND DEFENDANT**

City of Joburg Property Company SOC Ltd

AND TO:

**THIRD DEFENDANT**

City of Johannesburg Metropolitan Municipality