

IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION, PRETORIA

Case No.

In the matters between:

ORGANISATION UNDOING TAX ABUSE NPC

First Applicant

2 028 E-TOLL DEFENDANTS

Second to Two Thousand
and Twenty-Ninth Applicants

and

**SOUTH AFRICAN NATIONAL ROADS AGENCY
SOC LTD**

First Respondent

MINISTER OF TRANSPORT

Second Respondent

MINISTER OF ENVIRONMENTAL AFFAIRS

Third Respondent

**DIRECTOR GENERAL OF ENVIRONMENTAL
AFFAIRS**

Fourth Respondent

MINISTER OF FINANCE

Fifth Respondent

**COMMISSIONER, SOUTH AFRICAN REVENUE
SERVICE**

Sixth Respondent

CONFIRMATORY AFFIDAVIT

I, the undersigned,

ANDREA VAN HEERDEN




do hereby make oath and state:

1. I am an adult female Senior Legal Project Manager of the first applicant with offices situated at Unit 4, Boskruin Village, Cnr President Fouché and Hawken Road, Bromhof, Johannesburg, Gauteng.
2. The facts contained herein are, unless the contrary appears from the context, within my personal knowledge and are true and correct.
3. I have read the Founding Affidavit deposed by Stefanie Fick on behalf of the applicants in this matter and confirm the contents thereof insofar it relates me.



ANDREA VAN HEERDEN

The Deponent has acknowledged that she knows and understands the contents of this affidavit, which was signed and sworn to or solemnly affirmed before me at Pretoria on this the 14 day of August 2025, 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.



COMMISSIONER OF OATHS

Natasha Fourie
 LPCM: 43448
 Commissioner of Oaths
 Practising Attorney
 1 Ox Street
 Menlo Park, Pretoria
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