

Our Ref: N328/KS
Your Ref: Mr. Claassen/fb/CM0141

DATE: 27 JULY 2022

SERFONTEIN VILJOEN & SWART ATTORNEYS

Per Email: jd@svslaw.co.za

RE: RUTH NTLOKOTSE // NATIONAL UNION OF METAL WORKERS OF SOUTH AFRICA (NUMSA) AND TWO OTHERS
CASE NUMBER: J885/22

“EXTREMELY URGENT”

1. We refer to the above matter and to your letter of the 25th of July 2022.
2. Our clients view remain that your clients have not complied with the order of the honourable Judge Moshoana in that your clients have not complied with their own constitution in totality.
3. Your clients have publicly, on the mainstream news and social media indicated that it will proceed with the 11th National Congress today in defiance of the court order.
4. Before we approach the court for the appropriate relief, we are instructed to demand that your offices provide us with the minutes of the Special Central Committee meeting which took place on Tuesday the 26th of July 2022 at 08h00.
5. We are informed that a further Credentials committee meeting took place subsequent to the Special Central Committee meeting. It is our instruction to

AHMED GANI (B COM LAW – UNIVERSITY OF JOHANNESBURG, LLB – UNIVERSITY OF SOUTH AFRICA, HIGHER DIPLOMA IN TAX LAW – UNIVERSITY OF JOHANNESBURG)) **KEVIN SMITH** (LLB – UNIVERSITY OF WITWATERSRAND) **DR. MOHAMED SHAHIEM PATEL** (B COM LAW – UNIVERSITY OF JOHANNESBURG, B COM HR – UNIVERSITY OF JOHANNESBURG, B COM HONOURS (BUSINESS MANAGEMENT) – UNIVERSITY OF SOUTH AFRICA, M COM (LEADERSHIP STUDIES) – UNIVERSITY OF KWA-ZULU NATAL, PHD (LEADERSHIP STUDIES) – UNIVERSITY OF KWA ZULU NATAL) **YUSUF SUJEE** (LLB (CUM LAUDE) – UNIVERSITY OF SOUTH AFRICA) **IBRAHIM MIA** (LLB – UNIVERSITY OF SOUTH AFRICA, MASTERS IN ISLAMIC JURISPRUDENCE – DUZ)

request the minutes of the Credentials committee meeting also be provided to our offices.

6. Kindly ensure that the minutes of both meetings be forwarded to our offices by 1pm today at the latest.
7. As mentioned above, our clients maintain the view that your clients have not complied with the order. Should your clients assertion be that it is compliant, we ask for transparency demonstrating such compliance.
8. We trust you find the above in order.
9. In the interim, all our clients' rights remain reserved.

Yours Faithfully

ELECTRONICALLY TRANSMITTED

Mr. Yusuf Sujee

AHMED GANI (B COM LAW – UNIVERSITY OF JOHANNESBURG, LLB – UNIVERSITY OF SOUTH AFRICA, HIGHER DIPLOMA IN TAX LAW – UNIVERSITY OF JOHANNESBURG)) **KEVIN SMITH** (LLB – UNIVERSITY OF WITWATERSRAND) **DR. MOHAMED SHAHIEM PATEL** (B COM LAW – UNIVERSITY OF JOHANNESBURG, B COM HR – UNIVERSITY OF JOHANNESBURG, B COM HONOURS (BUSINESS MANAGEMENT) – UNIVERSITY OF SOUTH AFRICA, M COM (LEADERSHIP STUDIES) – UNIVERSITY OF KWA-ZULU NATAL, PHD (LEADERSHIP STUDIES) – UNIVERSITY OF KWA ZULU NATAL) **YUSUF SUJEE** (LLB (CUM LAUDE) – UNIVERSITY OF SOUTH AFRICA) **IBRAHIM MIA** (LLB – UNIVERSITY OF SOUTH AFRICA, MASTERS IN ISLAMIC JURISPRUDENCE – DUZ)