

Office No. 307 Provisus Bld
523 Stanza Bopape Street
Arcadia, Pretoria 0083
Po Box 7312, Pretoria 0001
Tel: 012 772 1607
cell: 076 957 1150
064 909 4342

Email: info@magabaneinc.com
Web: www.magabaneinc.com



Magabane AKE
Attorneys

OUR REF: AKE/CIV/20/19
YOUR REF:

DELIVERED BY: MAIL

DATE: 05TH FEBRUARY 2019

**MR. THOBILE NTOLA
THE GENERAL SECRETARY
SALIPSWU
LEVEL2, 34 ELLOF STREET
SALISBURY CLAIMS
JOHANNESBURG**

Email: info@salipswu.org.za

Tel: 071 432 6348

Dear Sir,

RE: YOUR PRESS STATEMENT OF THE 1ST FEBRUARY 2019.

1. We act herein on behalf of the South African Democratic Teachers Union and the following individuals: Walter Hlaise, Lucas Magope Mphahla, Nomarashiya Caluza and Veronica Hofmeester at whose instance we address this letter to you.
2. On the 1st February 2019 you held a press conference where you issued a statement making several defamatory and injurious allegations against our clients which allegations were widely circulated and published extensively in the media.
3. Amongst these allegations are the following:

*Managing Director: Amos Kgolane Eli Magabane
B Proc. (UNIN)*



- 3.1. SADTU is involved in state capture of various organs of state and unlawful activities at the South African Council of Educators including "huge and exorbitant claims at SACE for meetings".
- 3.2. Mr. Maphila was "bankrolled with thousands of rands" by SACE for his bereavement from SACE. We place on record that at no stage did our client receive any monies from SACE save for his legitimate claims related to his work at SACE. Your allegations are therefore wholly unfounded.
- 3.3. That Mr. Walter Hlaise is involved in the making of corrupt appointments and sexual abuse of staff at SACE.
- 3.4. That Ms. V. Hofmeester received a loan of R120 000.00 from SACE.
- 3.5. That Ms N Caluza is involved in the manipulation of appointments in the Kwa Zulu Natal Department of Education and that she does not have valid qualifications.
4. The above and many other allegations made in your statement and other statements have no basis in fact and in law whatsoever and are made with the clear intention to slander and defame our clients. You are well aware that these and many other statements you make are wholly untrue and that you are abusing your right to freedom of expression to defame and slander.
5. We have been instructed to demand of you the following:
 - 5.1. That you provide us with a written undertaking to immediately cease and desist from making any further defamatory statements against our clients and any leader of SADTU at any platform including at your own meetings and events.
 - 5.2. That you provide us with documentary proof of any claims for payment and proof of payment made by SACE to SADTU for any meeting.
 - 5.3. That you provide us with the full details of any appointment made either at SACE or elsewhere where SADTU was involved in your alleged manipulation.

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- 5.4. Evidence of any act constituting the capture of any organ of state referred to in your statement.
- 5.5. Proof of payment of the amount you claim was paid to Mr. Maphila for his bereavement and the claims you refer to in your statement.
- 5.6. Proof of payment of the amount of R120 000.00 you claim was paid to Ms Hofmeester.
- 5.7. Details of the corrupt appointments you allege Mr. Hlaise made or was involved in whether at SACE or elsewhere together with the details of the alleged sexual abuse you allege he is involved in at SACE.
- 5.8. Evidence of the alleged manipulation of the appointments you claim Ms Caluza is involved in.
- 5.9. The basis of your claim that Ms Caluza does not have any qualifications.
6. You are to provide us with the above information by not later than the 7th February 2019.
7. In the meantime, we are instructed to demand that you remove the allegations made in your statement from your website by not later than the 7th February 2019.
8. We are further instructed to demand of you payment of R3000 000.00 in respect of each of our clients for your defamatory allegations within three days hereof.
9. Should we not receive your favourable response in this regard we hold instructions to proceed with legal action without any further reference to you for appropriate relief.
10. Our clients fully reserve their rights to take legal action for relief regarding your defamatory allegations.

Managing Director: Ainos Kgolane Eli Magabane
B Proc. (UNIN)

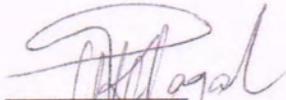
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Magabane AKE
Attorneys

Kind regards.


A MAGABANE


RECEIVED BY: _____
ON 05th FEBRUARY 2019

Managing Director: Amos Kgotane Eli Magabane
B Proc. (UNIN)