LIST OF QUOTES

This Application and its contents are described by President Mabunda in his Affidavits filed in the Pretoria High Court as –

- clearly vexatious (and).... that they (the Grahams) are probably not acting in good faith"; **Affidavit dated 21/11/13 paragraph 14**
- "that the Applicants (the Grahams) and/or Van Niekerk interfered in the Law Society's investigation from the outset ... and attempted to dictate to the Law Society." Reference was also made by the President to "Van Niekerk's appalling conduct in this matter"; **Affidavit dated 21/11/12 paragraph 7.8 and 17**
- that the "the relief (orders), provided for in the Notice of Motion (i.e. the Court Application), is essentially not sought by the Grahams, but by Van Niekerk and/or Discovery, on whose behalf Van Niekerk acts. It is abundantly clear that the Applicants (the Grahams) play a secondary role in these proceedings)"; **Affidavit – 4/04/13 – paragraph 5.16.**
- that "Van Niekerk .... is acting in interests other than those of the Applicants (the Grahams)" i.e. Discovery, which Van Niekerk admits instructs him and pays his bills; **Affidavit – 4/04/13 – paragraph 5.18**
- that "the Applicants (the Grahams) owe the Court an explanation as to untruths having been submitted to the Court under oath. The Applicant's and/or Van Niekerk, should in my view, be called upon to show cause why their conduct should not be considered to be perjury and an attempt to mislead the Court"; **Affidavit – 21/11/12 – paragraph 69.2**
- that "it is evident from the Applicants (the Grahams/Van Niekerk's) version that what they are really aggrieved about is the fact that they failed in their vigorous attempts to dictate to the Law Society and to interfere in the Law Society's investigation and disciplinary processes"; **Affidavit – 21/11/12 – paragraph 17**

- "despite the obvious involvement of Discovery, Van Niekerk attempts to explain that the applicants ..... bring the application in the interests of the public. I do not accept this contention, especially in view of the fact that the applicant's legal costs in the application are paid by Discovery. **It is furthermore apparent that this application is the result of a personal and highly acrimonious dispute between Discovery, assisted by Van Niekerk and the third respondent."** Affidavit – 04 April 2013 – paragraph 10.5.

Rs/31.1.14