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ATTORNEY  
JOHN JOSEPH FINLAY CAMERON  
HURLINGHAM OFFICE PARK, BLOCK G, GROUND FLOOR  
CR. WILLIAM NICOL & REPUBLIC ROADS, SANDTON  
(ENTRANCE IN WOODLANDS AVENUE)  
P O Box 41248, Craighall, 2024  
Tel: (002711) 285 0043 Fax: (002711) 325 4780  
Cellular: 072 041 8818  
E-mail: johncam@mwcb.co.za

Your Ref: Mr A Bloem  
Our Ref: J Cameron/at/Rooth & Wessels, Pretoria/Bobroff – LSNP striking off  
Date: 27 November 2016

ROOTH & WESSELS INC.  
WALKER CREEK OFFICE PARK  
2<sup>ND</sup> FLOOR, WALKER CREEK 2  
90 FLORENCE RIBEIRO AVENUE  
MUCKLENUK  
PRETORIA

P O Box 2265, Brooklyn Square, 0075

TELEFAX NO: (012) 452 4000  
TELEPHONE NO: 086 545 0264  
EMAIL: [simonw@rwafrica.com](mailto:simonw@rwafrica.com)

Dear Sirs

OUR CLIENTS: RONALD AND DAREN BOBOROFF ("THE BOBOROFFS") AND  
RONALD BOBOROFF AND PARTNERS INC. ("RBP")  
YOUR CLIENT: THE LAW SOCIETY OF THE NORTHERN PROVINCES ("LSNP")  
RE: APPLICATION BY YOUR CLIENT TO STRIKE OFF THE BOBOROFFS AS  
ATTORNEYS - IN THE HIGH COURT OF SOUTH AFRICA, GAUTENG DIVISION.  
PRETORIA - CASE NO. 20066/16 ("THE APPLICATION")  
RE: TWO FORENSIC REPORTS COMPILED BY THE LSNP AND DATED THE 27<sup>TH</sup>  
JANUARY 2016 AND 12<sup>TH</sup> DECEMBER 2014 AND ("THE LSNP REPORTS")

We refer to the Application and acknowledge receipt of your communication dated the 25<sup>th</sup>  
November 2016.

At the outset we record that:-

we have served on you our clients' notice of intention to oppose the application and  
in order to place ourselves on record as their attorneys - the service of this notice is  
not to be construed that our clients now or ever having accepted that the  
Application papers have been served on them as prescribed in the Uniform Rules of  
Court and/or in terms of the Directives contained in the Practice Manual; and

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2. we will be serving on you, by email, an extensive Rule 35 (12) notice on the 28<sup>th</sup> November 2016.

It is both necessary and prudent to record the undermentioned facts:-

1. prior to the 23<sup>rd</sup> November 2016 (the date upon which we emailed you our clients' notice of intention to oppose the Application) the writer was not the attorney of record for the Bobroffs and RBP and as regards the Application nor for that matter in those proceedings (an application and counter application) pending between the Bobroffs and Mr and Mrs J Graham ("the Grahams") in regard to case number 61790/12 ("the Graham Application"); and

2. due to the fact that the Bobroffs and RBP were unable to prevail upon other attorneys to represent them in the Application and the Graham Application the writer only recently agreed to represent them (and which then gave rise to the service of the notice of intention to oppose on you and a notice in terms whereof we gave notice of an appointment as the attorneys in the Graham Application); and

3. although we received from your offices (on the 26<sup>th</sup> August 2016) an entire set of the Application papers we received same on the basis that the Bobroffs required these in order to furnish same to the attorney / attorneys that they would identify and instruct in due course; and

4. on the 16<sup>th</sup> November 2016 we took delivery of approximately 50 lever arch files containing, in the main, the papers in the Graham Application; and

5. on the 18<sup>th</sup> November 2016 the writer formally instructed Adv D Vetten to represent our clients in the Application and the Graham Application; and

6. during the week of the 14<sup>th</sup> November 2016 (after unsuccessful attempts to engage the services of other forensic accountants all of whom refused to represent our clients) Ms Brenda Anderson agreed to perform forensic services for our clients and whereafter she was instructed to undertake an examination of the LSNP Reports) and to generate her own report and being responses to the LSNP Reports including the findings and opinions expressed therein – she was furnished with a copy of the LSNP Reports; and

7. on the 25<sup>th</sup> November 2016 Ms Brenda Anderson was furnished with all of the annexures to the LSNP Reports and she was furthermore requested to furnish our offices with an interim assessment of the documents and to indicate what further information and/or documents she would require to generate her own forensic report.

As you are in no doubt aware the papers in the Application and the Graham Application are voluminous and require a careful and thorough examination by Adv D Vetten, Ms B Anderson and the writer. The task to be undertaken, by its very nature, will be extremely time consuming (Adv D Vetten and the writer have commenced with this exercise) and furthermore we will require access to any amount of information and documentation which does not form part of the LSNP Reports (the contents whereof "lie" at the heart of the Application and the Graham Application) – an extensive Rule 35 (12) notice will be transmitted to you on the 28<sup>th</sup> November 2016.

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By virtue of the foregoing it will be impossible for Adv D Vetten and the writer to represent our clients in a meaningful and professional manner on the date on which the hearing of the Application and the Graham Application are enrolled (the 6<sup>th</sup> December 2016 as directed by Judge Ledwaba) - for the record the writer and our clients do not accept that such enrolment was competent including the competency of all of the directives issued pursuant thereto - our clients rights in this regard are reserved (in this regard we contend that it is necessary that you be furnished with a communication that we have received from attorney Taitz and Skirne dated the 8<sup>th</sup> September 2016, a copy whereof is attached hereto).

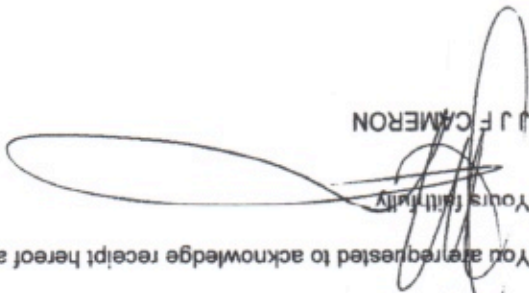
Arising from what is recorded hereinabove we propose that a meeting be arranged with Judge Ledwaba in order that we may appraise him of the aforementioned facts and that he be requested to rescind his directives and to issue other directives including a directive that the hearings of the Application and the Graham Application take place in or about June/July 2017. We contend that this request is:-

1. reasonable; and
2. in no way prejudices your client and the Grahams (the Bobroffs are currently suspended from practising as attorneys and are currently in Australia).

In closing we record that it is our intention to communicate with Judge Ledwaba's Registrar in order that we may arrange with him/her a suitable date and time for the proposed meeting - we intend requesting the meeting to take place on Wednesday morning the 30<sup>th</sup> November 2016.

You are requested to acknowledge receipt hereof and we await your advice here to.

J J F CAMERON



Yours faithfully