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**IN THE HIGH COURT OF SOUTH AFRICA**

**GAUTENG DIVISION, PRETORIA**

**CASE NO: 20066/2016**  
**AND**  
**CASE NO. 61790/2012**

In the matter between:

**RONALD BOBROFF**

First Applicant

and

**DARREN RODNEY BOBROFF**

Second Applicant

and

**THE LAW SOCIETY OF THE NORTHERN PROVINCES**

First Respondent

**JENNIFER GRAHAM**

Second Respondent

**MATTHEW GRAHAM**

Third Respondent

**STEPHEN DEREK BEZUIDENHOUT**

Fourth Respondent

**IN RE:**

**CASE NO: 20066/2016**

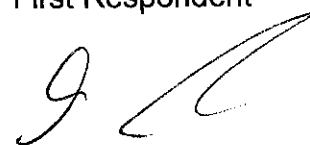
**THE LAW SOCIETY OF THE NORTHERN PROVINCES**

Applicant

and

**RONALD BOBROFF**

First Respondent



**DARREN RODNEY BOBROFF**

Second Respondent

**STEPHEN DEREK BEZUIDENHOUT**

Third Respondent

**RONALD BOBROFF AND PARTNERS INC.**

Fourth Respondent

**JENNIFER GRAHAM**

Fifth Respondent

**MATTHEW GRAHAM**

Sixth Respondent

**AND**

**IN RE:**

**CASE NO. 21790/2012**

**THE LAW SOCIETY OF THE  
NORTHERN PROVINCES**

Applicant

and

**JENNIFER GRAHAM**

First Applicant in the main application

**MATTHEW GRAHAM**

Second Applicant in the main application

**ROAD ACCIDENT FUND**

Intervening Third Applicant in the main application

**RONALD BOBROFF AND  
PARTNERS INC.**

Second Respondent in the main application

**RONALD BOBROFF**

Third Respondent in the main application

**DARREN RODNEY BOBROFF**

Fourth Respondent in the main application



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**APPLICANTS' FOUNDING AFFIDAVIT**

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I, the undersigned

**RONALD BOBROFF**

do hereby make oath and state: -

**DEPONENT'S DESCRIPTION AND PERSONAL INFORMATION**

1. I am the First Applicant in these proceedings and am a major male legal practitioner (although currently having been suspended from practicing as such under those circumstances indicated hereinbelow). I am temporarily residing at 11 Shannon Street, St. Ives, Sydney, Australia.
2. The facts herein contained are, save or where otherwise indicated, within my own personal knowledge and are true and correct.
  - 2.1. I reside at the address indicated in paragraph 1 on a temporary basis - I will address the circumstances that caused me to travel to and to take up temporary residence in Australia hereinbelow.
3. Notwithstanding that I have a right to reside permanently in Australia, I consider my permanent place of residence to be the residential property that my spouse



owns and in which she resides and being 40 Pentrich Road Victory Park Estate, Johannesburg - I draw attention to the fact that my spouse has travelled to Australia on two occasions to visit the Second Applicant, his two minor children and me - On the first occasion she returned to South Africa and in due course (as she is presently in Australia) intends to return home shortly. In mentioning these facts, I do so in further substantiation of the fact that the Second Applicant and I have not surrendered our permanent residence in South Africa and we consider South Africa and places of residence as our permanent place of residence – my 2 daughters and their children also reside permanently in Johannesburg.

4. At all material times, I was a director and major shareholder (50%) of an incorporated company, Ronald Bobroff & Partners Inc. (herein after referred to by me as the "Firm"), the other shareholders being the Fourth Respondent (25%) and the Second Applicant (25%), the Firm carrying on the business of an attorneys practice and specialising in the institution of actions against various parties and more specifically the Road Accident Fund (hereinafter referred to by me as the "RAF") and arising from motor vehicle collisions and/or medical malpractice events.

#### **IDENTITY OF THE PARTIES**

5. The Second Applicant is **DARREN RODNEY BOBROFF** (hereinafter referred to by me as "Darren") my son, temporarily residing at 11 Shannon Street, St. Ives, Sydney, Australia. Until Darren's departure from South Africa on the 16<sup>th</sup> March 2016, Darren was resident at 13A Pentrich Road, Victory Park Estate,



Johannesburg. I annex hereto as **Annexure FA 1**, Darren's confirmatory affidavit and for the reason that I am also deposing to this affidavit on his behalf and I refer to him in specific instances herein below.

6. The First Respondent is **THE LAW SOCIETY OF THE NORTHERN PROVINCES** (hereinafter referred to by me as "the LSNP"):-

6.1. is a state organ incorporated in terms of Section 56 of the Attorneys Act by virtue of the Attorneys Amendment Act No 40 of 2004 became known as the LSNP; and

6.2. at all material times, has been represented by Attorneys Rooth & Wessels Inc. of Walker Creek Office Park, 2<sup>nd</sup> Floor, Walker Creek 2, 90 Florence Ribeiro Avenue, Meukleneuk, Pretoria (hereafter referred to by me as the "LSNP Attorneys"); and

6.3. has been represented in the LSNP Application (referred to herein below in paragraph 17) by its vice president being Sibusiso William Mavela Gule (herein after referred to by me as the "LSNP Vice President"); and

6.4. commissioned a forensic accounting investigation and arising therefrom 2 reports were generated dated the 12<sup>th</sup> December 2014 (herein after referred to by me as the "First LSNP Report") and the second dated the 27<sup>th</sup> January 2016 (herein after referred to by me as the "Second LSNP Report") (in the First LSNP Report, an investigation was undertaken in regard to the Grahams file and the De La Guerre file including an investigation into the



accounting records of the Firm relative to the aforesaid matters; and in the second LSNP report, an investigation was purportedly undertaken into the files and records of the Firm generally) – the First LSNP Report **was generated by a very senior and experienced accountant and being Deleuw Swart** whereas the Second LSNP Report were not undertaken by independent expert forensic auditors but by junior persons in the full time employment of the LSNP (I draw attention to the fact as these reports are not independent in nature).

7. The Second and Third Respondents are **JENNIFER GRAHAM** and **MATTHEW GRAHAM**, an adult female and an adult male respectively (hereinafter referred to by me as “the Grahams”). At all material times, the Grahams have been represented by Attorneys Edward Nathan Sonnenberg Inc., care of Weavind & Weavind Inc. of Block E Glenfield Office Park, 361 Oberon Avenue, Faerie Glen, Pretoria.
8. The Fourth Respondent is **STEPHEN DEREK BEZUIDENHOUT** (hereinafter referred to by me as “Bezuidenhout”), an adult male, a duly admitted and practising attorney of the above Honourable Court and who is presently being represented by Attorneys Brugmans Inc., care of Sanet de Lange Inc. 1 Ox Street, corner of Brooks and Ox Streets, Menlo Park, Pretoria. As indicated earlier, the fourth respondent is also a shareholder and erstwhile director of the Firm.

**PURPOSE OF THIS AFFIDAVIT AND THE RELIEF SOUGHT IN THE NOTICE OF MOTION TO WHICH THIS AFFIDAVIT IS ANNEXED**



9. The purpose of this application is to seek the striking of the LSNP Application and the Graham Counter Application (referred to by me in paragraph 24 hereinbelow) from the roll or alternatively, to seek a postponement of the relief sought in the LSNP Application and in the Graham Counter Application.

10. As regards the striking of the LSNP Application and the Graham Counter Application from the roll, Darren and I contend that:

10.1. the LSNP Application has never been served on us in terms of the Uniform Rules of Court; and

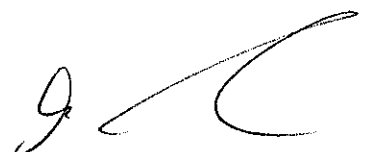
10.2. the directives of Judge Ledwaba (referred to in paragraph **15** hereinbelow) and the subsequent service of a notice of set down was irregular.

11. As regards the postponement of the LSNP Application and the Graham Counter Application, we seek same:-

11.1. pending the outcome of a declaratory application (referred to in paragraphs 12 - 14 hereinbelow);

11.2. and, for the reasons that Darren and I be afforded an opportunity to respond to the following court documents (and more specifically when a forensic report has been generated by our forensic accountant, referred to in paragraphs **51 - 54** hereinbelow):-

11.2.1. the founding affidavit in the LSNP Application; and



11.2.2. the First LSNP Report; and

11.2.3. the Second LSNP Report; and

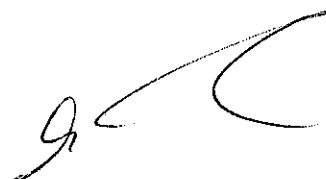
11.2.4. the answering affidavit of Bezuidenhout in the LSNP Application;  
and

11.2.5. the consolidated replying affidavit of the Grahams in the Graham Counter Application (this affidavit is deposed to by their attorney, Mr G van Niekerk), which affidavit contains any amount of “new matter” and which new matter requires to be replied to - leave to do so will be sought in due course; and

11.3. **and** in further protection of our rights as we might be advised, including the possibility of the administrative review or other legal challenge to the First and the Second LSNP reports and any other material decisions taken by the LSNP Council which has affected the rights of Darren and myself.

**THE NON-SERVICE OF THE LSNP APPLICATION REFERRED TO IN  
PARAGRAPHS 17 – 18 AND THE APPLICANTS’ DECLARATORY APPLICATION**

12. Simultaneously with the launch of this application Darren and I will launch a declaratory application, a copy of the relevant notice of motion I annex hereto as **Annexure FA 2** (I herein after refer to the declaratory application as the “Declaratory Application”).

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13. In the Declaratory Application Darren and I will contend that the LSNP Application cannot be heard for the reason that the application was not served on us in terms of the Uniform Rules of the above Honourable Court, i.e. we will seek declaratory orders to the effect that the LSNP Application has not been served on us and that the directives of Judge Ledwaba are of no legal force and/or effect (these directives referred to in Annexure FA 5 and more specifically referred to in paragraph 12 hereinbelow).
14. The facts surrounding the Declaratory Application can be summarised as follows:-
- 14.1. on the 11<sup>th</sup> March 2016, the LSNP attorneys emailed the notice of motion and founding affidavit in the LSNP Application to our then attorneys of record in the Grahams' Application, Taitz & Skikne, and more specifically to a Mr Rael Zimmerman (hereinafter referred to by me as "Zimmerman"), a copy of the email which accompanied these documents I annex hereto as **Annexure FA 3**. The first occasion that I became aware of Annexure FA 3 was when it was it was annexed as Annexure "4" to the affidavit of the LSNP Vice President's affidavit (undated) (this affidavit was in support of an edictal citation application by the LSNP to serve a notice of set down (for the 6<sup>th</sup> December 2016) and on Darren and myself at 1 of 2 addresses; and
- 14.2. according to Zimmerman and in a communication addressed by him to Cameron and dated the 8<sup>th</sup> September 2016, a copy whereof I annex hereto as **Annexure FA 4**, he speculated that he had never responded to Annexure FA 4 (this appears to be so by virtue of the fact that in the affidavit



of the Vice President of the LSNP no mention is made of a response by Zimmerman to Annexure FA 4); and

14.3. it is self-evident from Annexure FA 3 that the LSNP attorneys did not email to Zimmerman all of the annexures to the founding affidavit and which annexures are in excess of 1 000 pages.

15. It is necessary to draw attention to the following facts:-

15.1. that notwithstanding Zimmerman not having served a notice of intention to oppose the LSNP Application (on behalf of the Firm, Darren, Bezuidenhout and myself), Zimmerman was instructed to appear at a meeting that the Deputy Judge President, Judge Ledwaba, convened and held at his chambers on the 18<sup>th</sup> August 2016 (Darren and I record that we were never made aware of this meeting prior thereto and only became aware of same after Cameron received Annexure FA 5 from Zimmerman); and

15.2. apparently Zimmerman failed to record at the meeting that he was not representing RBP, Darren, Bezuidenhout and myself in the LSNP application; did not record that he had not served a notice of intention to oppose the LSNP Application; and did not record that the LSNP Application had not in fact been served on the Firm, Darren, Bezuidenhout and myself (as I have indicated hereinabove in paragraph 14, Zimmerman had only received by email a notice of motion and founding affidavit **and no other documents and being the annexures to the founding affidavit**); and



15.3. at the meeting on 18 August 2016, Judge Ledwaba directed that the LSNP Application (he only having referred to the LSNP case number,) be enrolled for a hearing on the 6<sup>th</sup> December 2016 and directed the service and filing of an answering affidavit, a replying affidavit and heads of argument; and

15.4. subsequent to the meeting, Judge Ledwaba authored a communication dated the 24<sup>th</sup> August 2016, a copy whereof I annex hereto as **Annexure FA 5** - I draw attention to the fact that Annexure FA 5 refers to an incorrect case number; and

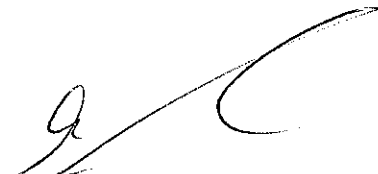
15.5. subsequent to Zimerman receiving Annexure FA 5, he emailed it to Cameron and which then resulted in Cameron addressing a communication to Zimerman dated the 8<sup>th</sup> September 2016, a copy whereof I annex hereto as **Annexure FA 6**. In Annexure FA 6, Cameron recorded that he was not acting for the Firm, Darren and myself in both the Graham Counter Application and the LSNP Application and sought from Zimerman an explanation as to why a notice of set down in the LSNP Application, a copy whereof I annex hereto as **Annexure FA 7**, had been served on Zimerman's correspondent attorneys, Rontgen & Rontgen; and

15.6. in response to Annexure FA 7, Zimerman addressed a communication to Cameron dated the 8<sup>th</sup> September 20126, a copy whereof I annex hereto as **Annexure FA 8**. In Annexure FA 8, Zimerman confirmed that he had never represented the Firm, Darren and myself in the LSNP Application and that as regards the Graham Counter Application, he had withdrawn representing the Firm, Darren and myself, a notice of withdrawal recording this fact I



annex hereto as **Annexure FA 9** – I draw attention to the fact that Annexure FA 9 indicates service thereof on the LSNP Attorneys on the 25<sup>th</sup> August 2016 and on the Graham attorneys on the 24<sup>th</sup> August 2016; and

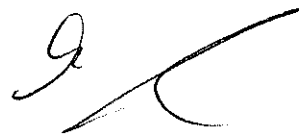
15.7. the first occasion that Darren and I “received” the annexures to the founding affidavit of the LSNP Vice President was when the LSNP attorneys made these available to Cameron on or about the 26<sup>th</sup> August 2016 (Cameron was acting in other matters for Darren and myself and as detailed hereinbelow). Shortly prior to the 26<sup>th</sup> August 2016, I had requested Cameron to request from the LSNP attorneys that a copy of the entire LSNP Application papers be made available to him and in anticipation of Darren and me identifying and thereafter employing the services of an attorney and counsel and to consider our legal position including instructing these persons to oppose the Graham Counter Application and the LSNP Application - Cameron was then not able to act in these matters, and was instructed to retain the papers in the LSNP Application and to be handed over to an attorney that we envisaged instructing (neither Darren nor I have ever received the papers in the LSNP Application and as was furnished by the LSNP Attorneys to Cameron). I annex hereto as **Annexure FA 10**, the communication addressed by Cameron to the LSNP attorneys, wherein he recorded an arrangement in terms whereof he was to collect a copy of the application papers in the LSNP Application – Annexure FA 10 makes it clear that Cameron was not acting on the Firm's, Darren's and my behalf in the LSNP Application.

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16. By virtue of the foregoing facts, Darren and I contend that we have never received a full set of the papers in the LSNP Application and accordingly there has not been service thereof and in terms of the Uniform Rules of Court.

**THE FAILURE TO HAVE SET DOWN THE GRAHAM APPLICATION**

17. As I have indicated hereinabove, Annexure FA 5 **only** pertains to and refers to the LSNP Application (albeit with the incorrect case number), i.e. it does not pertain to and/or refer to the Graham Counter Application – incidentally, the service of a notice of set down by the LSNP attorneys in regard to the LSNP Application was served on the correspondents of Taitz & Skikne on the 26<sup>th</sup> August 2016 and by which date Taitz & Skikne were not the attorneys of record for the Firm, Darren or myself.
18. There has been no proper notice of set down served on Darren, the Firm and/or myself of the Graham Counter Application and accordingly the Graham Counter Application has not been properly enrolled for a hearing.
19. I have been advised that there is an unsigned document, purporting to be a letter emanating from the office of the DJP that is identical to Annexure FA 5, save in one respect, that it includes reference to the case number in regard to the Graham Counter Application (it is also dated the 24<sup>th</sup> August 2016). I annex hereto as **Annexure FA 11** a copy of this letter. Cameron, Darren and I know nothing about the origins of this letter, i.e. it does not appear to be an authentic communication from the DJP's office, as it has not been signed by him or for that matter on his behalf. Again there has been no proper service of a notice of set


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down (as Darren and I have been present in Australia for some time, the only manner in which proper service of the set down notice could have been effected would have been in the same manner that the LSNP attorneys had employed – referred to in paragraphs 21 – 23 hereinbelow).

20. By virtue of the foregoing facts, Darren and I contend that the Graham Counter Application has not been properly enrolled for a hearing and should be struck from the roll.

#### **THE EDICTAL CITATION IN THE LSNP APPLICATION**

21. Conscious of the fact that Taitz & Skikne had withdrawn in the Graham Counter Application, but deliberately ignoring the fact that the LSNP application had not been served, the attorneys for the LSNP in the LSNP application applied to the above honourable court (under case no 74240/2016) on an ex parte basis (hereinafter referred to by me as the “edictal application”), for leave to serve the notice of set down by way of substituted service.
22. I annex the notice of motion in regard to the edictal application as **Annexure FA 12.**
23. Only the LSNP application's notice of set down was served on Darren and I. the Graham counter application's set down has never been served on us. This is despite the fact that the LSNP attorneys act for the LSNP in both applications. This does not cure the failure to have set down the Graham counter application.



**RELEVANT BACKGROUND CIRCUMSTANCES GIVING RISE TO THIS APPLICATION**

24. On the 23<sup>rd</sup> April 2015, the Grahams launched the Graham Counter Application, a copy of the relevant notice of motion I annex hereto as **Annexure FA 13** (hereinafter referred to by me as the "Graham Counter Application"). I draw attention to the fact that the Firm only represented Mr Graham and that in regard to his matter and in the other matter which formed the subject matters of the Graham Counter Application, de la Guerre, I was not the attorney who dealt with these matters **or any of those other matters referred to in the Second LSNP Report**, and to the knowledge of Attorney G van Niekerk, who deposed to the founding affidavit, and notwithstanding these facts, Attorney G van Niekerk, on behalf of the Grahams, sought that I be suspended. In Annexure FA 13, the Grahams sought orders *inter alia* as follows:-

24.1. that Darren and I be suspended from practicing as attorneys pending the completion of an investigation and a report; and

24.2. the appointment of a curator to administer the business of the Firm; and

24.3. that LSNP investigators inspect the books and records of the Firm for the purposes of determining those ex-clients of the Firm that concluded common law contingency fee agreements and to determine which clients were overreached/overcharged.



25. On the 24<sup>th</sup> February 2016 and by way of an application of intention to amend the relief sought in its counter application notice, a copy whereof I annex hereto as **Annexure FA 14**, the Grahams sought to amend Annexure FA 13 and to seek additional and/or alternative relief in the form of orders against Darren and me, as well as the LSNP, and which *inter alia* included:-

25.1. that Darren and I be suspended from practicing as attorneys pending the completion of an investigation and report; and

25.2. that a *rule nisi* be issued calling upon Darren and I to show cause why we should not be struck off the roll of attorneys.

26. In response to Annexure FA 14, Darren and I opposed the relief (at the hearing on the 14<sup>th</sup> March 2016) sought in that notice. I annex hereto as **Annexure FA 15**, a copy of Darren and my notice of intention to oppose the relief sought by the Grahams in Annexure FA 14 - notwithstanding Darren and my opposition to the relief sought in Annexure FA 14, same was granted, which grant was contained in the judgment **referred to** in paragraph 32 hereinbelow.

27. On a date that I am not certain of but would have been in the first week of March 2016, a report (hereinafter referred to by me as "the Second LSNP Report") authored by 2 chartered accountants, in the employ of the LSNP, Ashwin Reddy (hereinafter referred to by me as "Reddy") and Mrs P Mapfumo (hereinafter referred to by me as "Mapfumo") was furnished to me – the contents of the Second LSNP Report was such that it was impossible for Darren and me to respond thereto by the 14<sup>th</sup> March 2016, i.e. it appeared certain that the Second





and Third Respondents would rely upon and refer to it during the course of the Graham Counter Application hearing on the 14<sup>th</sup> March 2016.

28. On the 11<sup>th</sup> March 2016, the LSNP launched an application (hereinafter referred to by me as "the LSNP Application") out of the above Honourable Court (3 days prior to the hearing of the Graham Counter Application which had been enrolled for a hearing on the 14<sup>th</sup> March 2016) – it would appear that when the LSNP Application was launched, that Reddy had not signed the affidavit which is annexed to the LSNP Application (at paginated pages 275 - 277) and for the reason that that affidavit was only commissioned on the 14<sup>th</sup> March 2016.

29. The LSNP Application:-

29.1. sought, *inter alia*, that Darren and I be struck from the roll of attorneys of the above Honourable Court; and

29.2. provided in page 14 of the notice of motion, a copy whereof I annex hereto as **Annexure FA 16**, that in the event that Darren and I intended opposing the application, then we had 5 days after service of this application to notify the LSNP attorneys of our intention to do so; and

29.3. recorded in page 15 of the notice of motion, a copy whereof I annex hereto as **Annexure FA 17**, that service of the LSNP Application would be effected by the service thereof by the sheriff concerned and at the then business address of Ronald Bobroff & Partners Inc. (hereinafter referred to by me as "the Firm").



30. On the 14<sup>th</sup> March 2016, the Graham Counter Application was to be argued – at that stage, our attorney was Rael Zimmerman (hereinafter referred to by me as “Zimmerman”) and who had instructed Adv Nazir Cassim S.C. (hereinafter referred to by me as “Cassim”). Prior to the hearing on the 14<sup>th</sup> March 2016, Cassim undertook to object to the Grahams’ counsel referring to the Second LSNP Report and more specifically for the reason that Darren and I had only recently received same and required to respond to same (I draw attention to the fact that Gule in an affidavit in February 2016 had recorded that Darren and I should be given an opportunity of responding to the Second LSNP Report and during the course of disciplinary proceedings) and furthermore undertook to seek a postponement of the Graham Counter Application.

31. On the 14<sup>th</sup> March 2016:-

31.1. the LSNP Application was not before the Court; and

31.2. the Grahams sought an order that their notice of motion be amended to include an order that Darren and I be struck as attorneys of the above Honourable Court; and

31.3. the interlocutory application of the LSNP in the Graham application was argued (this was an application in which the LSNP sought an extension of time within which to complete its investigation and to file the LSNP Report); and

31.4. the Graham Counter Application was argued; and

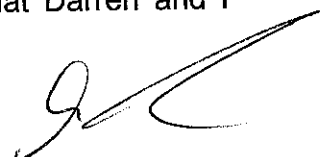


31.5. after all three applications herein above were argued, judgment was reserved.

32. On the 26<sup>th</sup> April 2016 and in regard to a portion of the Graham's counter Application, a judgment was delivered by Makgoka J, a copy whereof is annexed hereto as **Annexure FA 18**. In Annexure FA 12, Darren and I were suspended from practising as attorneys and conveyancers and pending the determination of the LSNP Application (which was not before the Court – the Court apparently took judicial cognizance of its existence nonetheless) and the remainder of the Graham Counter Application and in which applications they sought to strike Darren and myself from the roll of attorneys (other relief was also granted including an interdict in terms whereof Zimmerman was interdicted from implementing a sale of business agreement that had been concluded between Taitz & Skikne and the Firm - the Firm having sold its practice to Taitz & Skikne including all of its client base and instructions relative to pending actions of its clients against various parties but more specifically the Road Accident Fund).

**THE DEPARTURE OF THE APPLICANTS FROM SOUTH AFRICA AND THE REASONS THEREFOR INCLUDING REASONS WHY WE HAVE NOT RETURNED**

33. On the 17<sup>th</sup> and 20<sup>th</sup> March 2016, Darren (his spouse and 2 minor children) and I left South Africa and which we did so under the circumstances indicated herein below.
34. The first threats (Bezuidenhout had already been threatened by Attorney Katz, a full time employee of Discovery Health and in 2014) that Darren and I



experienced (which was the first of many threats including abusive telephone calls including a deluge of email and twitter messages from Attorney Millar and a reporter, Beamish) was when Attorney Katz had and on the 16<sup>th</sup> June 2015, uttered threats which traumatised Darren's 2 minor children and his wife. The seriousness of the threats were such that Darren addressed a communication to the LSNP dated the 30<sup>th</sup> July 2015 and which I annex hereto as **Annexure FA 19** (Annexure FA 19 was addressed to the LSNP **as** by virtue of the fact that Katz is a duly admitted attorney and Darren and I considered Katz' threats as constituting unprofessional conduct and worthy of the LSNP conducting the relevant disciplinary hearing (the LSNP acknowledged receipt of Annexure FA 19 after a long passage of time to request an acknowledgement of receipt and its legal officer, Mr J Fourie, permitted Katz a period of 6 months within which to respond to the complaint – the usual response period being 14 days - nor conducted the relevant disciplinary hearing into Katz' conduct).

35. The "final" event that led to Darren and myself departing South Africa was a telephone call to me and at the offices of the Firm and on the 15<sup>th</sup> March 2016:-

35.1. the person who telephonically contacted me had disguised his voice **electronically** and the words were uttered in a "robotic" form; and

35.2. this person advised me that Darren, Darren's spouse and myself were in grave and imminent danger, which danger was to the effect that we would be arrested by the SAPS, would be incarcerated and that there were



persons within the prison system that had been specifically engaged (employed) so as to exact physically harm on us including harm in the nature of being raped.

36. I draw attention to the fact that when Darren and I departed South Africa, it was our intention to return within a few days and once we had investigated the source of the threat referred to herein below. I annex hereto as **Annexures FA 20** and **FA 21**, the electronic air travel tickets which indicate that Darren and I intended to return to the Republic on the 22<sup>nd</sup> March 2016 (these air tickets have not been cancelled and/or encashed by ourselves and we intend to utilise same and in order to return to our respective homes in South Africa).

37. Although I am unable to prove that the same person was involved in the incident referred to herein below, Darren and I contend that our fears were well founded and as a consequence of:-


37.1. me receiving on my cellular telephone, whilst in Sydney, a text message, a screen grab whereof I annex hereto as **Annexure FA 22** – as is self-evident from Annexure FA 22, I received this text message early in Sydney on the morning of the 22<sup>nd</sup> March 2016 and at that stage it was 07h15 on the 21<sup>st</sup> March 2016 in South Africa; and

37.2. as will be noticed from Annexure FA 22, the text message was to the effect that the Hawks intended arresting “wives” at 07h30 at Cassim’s house (this is a reference to Adv Nazeer Cassim S.C. – how this person



knew that my wife was to consult with Adv N Cassim on the 21<sup>st</sup> March 2016 and at 07h30 is yet another cause for concern).

38. The event indicated in paragraph 37 was of such a nature that Darren and I perceived that Darren, Darren's spouse and I were in imminent danger and as our "lives" were at risk it would be absolutely necessary to depart from South Africa for a few days and during which time a private investigator would investigate various persons that we suspected to be involved in ensuring that we be arrested by the SAPS and be subject to abuse within the South African prison system.
39. Notwithstanding our presence in Australia, 3 abusive communications have been received by Darren and me. I annex hereto as **Annexures FA 23, FA 24 and FA 25**, emails dated the 18<sup>th</sup> October 2016, the 4<sup>th</sup> November 2016 and the 21<sup>st</sup> November 2016. It is self-evident from the contents of Annexures FA 23, FA 24 and FA 25 that the person or persons concerned are mentally unstable and although the person/persons threaten physical harm aimed at harming Darren's children in Australia and my daughters in South Africa, these threats are treated by Darren and I seriously (unfortunately, Darren and I have little faith including confidence of being protected by the South African Police Services in South Africa and we would rather take our chances in Australia and be protected by the Australian Police Services).
40. The obvious instability of the authors of Annexures FA 23, FA 24 and FA 25 are of such a nature that Darren and I believe that this person/these persons are issuing threats aimed at pressurising Darren and I to return to South Africa and whereafter we would be the subject matter of all manner of attempts on our lives



and if not attempts on our lives, serious assaults on our persons (as I have indicated herein above, the person/persons concerned are mentally unstable and no doubt their mental instability will be accelerated should we be successful in opposing the LSNP Application and the Graham Counter Application).

**ALLEGATIONS THAT THE APPLICANTS ARE FUGITIVES FROM JUSTICE AND DEPARTED SOUTH AFRICA IN ORDER TO ESCAPE THE EXECUTION OF WARRANTS FOR THEIR ARREST**

41. Prior to the 23<sup>rd</sup> March 2016, Darren and I were represented by David H Botha, du Plessis and & Kruger Inc. (herein after referred to by me as "BDK"). BDK represented Darren and myself for the reason that we had been advised that the National Prosecuting Authority (more specifically the Office of Serious Economic Offences) intended preferring criminal charges against us and which charges related to a number of complaints (these complaints emanated from only Millar and van Niekerk) that had been lodged with the South African Police Services.
42. It has been alleged that Darren and I were to be arrested and as a consequence we decided to "flee" from South Africa in order to avoid arrest and as a result of our departure from South Africa, we are labelled "fugitives from justice".
43. On the 23<sup>rd</sup> March 2016, BDK drafted and transmitted a communication titled "Press Release", a copy whereof I annex hereto as **Annexure FA 26**. In Annexure FA 26, BDK confirmed that no charges had been brought against Darren and myself and that BDK had never been provided with or had any sight of warrants for our arrest. By virtue of the foregoing, Darren and I record that, to



our knowledge, no such warrants of arrest exist and that being so, we did not depart South Africa to avoid warrants of arrest being put into effect, i.e. Darren and I accordingly contend that we are not fugitives from justice and that we remain in Australia by virtue of actual and/or veiled threats which we have no option but to treat seriously (these threats are also directed at Darren's minor children who have been emotionally affected by the upheaval surrounding their sudden departure from South Africa including their home environment and their friends).

**THE APPLICANTS' ATTORNEY OF RECORD AND BEING ATTORNEY JOHN JOSEPH FINLAY CAMERON ("CAMERON") VIZ-A-VIZ 9 RESCISSION APPLICATIONS**

44. At present, and from 23 November 2016, the attorney of record for Darren and myself in the LSNP Application and the Graham Counter Application is Cameron. For the reason that I refer to herein below I will cause him to depose to a confirmatory affidavit and to annex same to this affidavit as **Annexure "X"**.

45. Cameron's relationship with Darren and myself can be summarised as follows:-

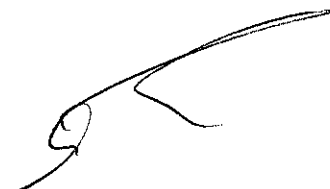
45.1. at the beginning of May 2016, a practising attorney (who I will refrain from identifying and for the reason that he has requested that I do not do so) recommended to Darren and me that we should consider approaching Cameron in order to assist us in setting aside 9 settlement agreements and the court orders that were made pursuant thereto which agreements related to 12 ex-clients of the Firm (these persons, represented by





Attorneys Norman Berger and Partners Inc., had concluded 9 settlement agreements with Bezuidenhout and/or Zimmerman without any authority from Darren and myself and without our knowledge and resulted in all of us attracting and incurring a financial liability in the region of R15 Million); and

- 45.2. in advance of me telephonically communicating with Cameron, the practising attorney indicated in 45.1 inquired from Cameron as to whether he was prepared to act for the Firm , Darren and myself in regard to those matters indicated in 45.1 (hereinafter referred to by me as the "Rescission Applications"); and
- 45.3. after discussing the Rescission Applications with Cameron, Cameron agreed to represent the Firm and more specifically for the purposes of launching rescission applications in order to rescind the 9 settlement agreements; and
- 45.4. during the course of my initial contact with Cameron and a number of other telephonic contacts thereafter I appraised Cameron of the pending striking off applications, inter alia. I furthermore inquired from Cameron whether he would be prepared to represent the Firm , Darren and myself as regards these applications (at that stage the hearing date for the Graham Counter Application had not been set down and furthermore Darren and I (and I presume Bezuidenhout) had not been served with the LSNP Application, i.e. in terms of the Uniform Rules of Court); and

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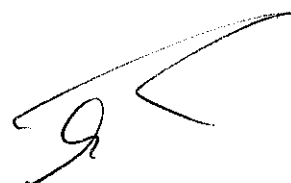
45.5. in response to my inquiry indicated in paragraph 45.4, Cameron advised me that he was unable to act in the striking off matters as in the first instance he did not have capacity to do so and had no specialised knowledge and experience in complaint matters which arose as a consequence of the use of common law contingency fee agreements, i.e. more specifically allegations of "over-reaching" arising therefrom.

**THE APPLICANTS' INABILITY TO INSTRUCT SUITABLE LEGAL REPRESENTATIVES TO OPPOSE THE LSNP APPLICATION AND THE GRAHAM COUNTER APPLICATION**

46. As I have indicated herein before, Cameron was not prepared to represent the Firm , Darren and myself in the pending LSNP Application and the Graham Counter Application. Cameron's reluctance to represent us was as a consequence of him:-

46.1. not having the time to familiarise himself with the these applications including reading through thousands of pages of pleadings and documents; and

46.2. his total lack of experience and knowledge concerning Road Accident Fund related matters and specifically the legal aspects surrounding common law contingency fee agreements and contingency fee agreements in terms of the Contingency Fees Act.

A handwritten signature, possibly reading 'G', is located in the bottom right corner of the page.

47. Since May 2016, Darren and I have approached many attorneys (sole practitioners and attorneys in partnerships and incorporated companies) in order to prevail upon these persons to represent us in the LSNP Application and the Graham Counter Application – I am not at liberty to identify the names of these attorneys and in order not to embarrass them. These attorneys all refused to represent the Firm, Darren and myself on a number of grounds

47.1. they were too busy and/or they had little or no knowledge concerning RAF matters including the legal aspects relative to contingency fee agreements; and/or

47.2. acting for Darren and myself would have adverse consequences for them including attracting unwarranted attention from the LSNP; and/or

47.3. they represented Discovery Health Life (or 1 or more of the Discovery related companies), that being the entity that was funding and driving the Graham Counter Application; and/or

47.4. would be frowned upon by the general "Jewish community"(in the case of Jewish attorneys); and/or

47.5. would result in them not receiving legal work from persons who would otherwise instruct them in matters but for the fact that they were or had acted for Darren and myself.

48. By the beginning of November 2016, Cameron had been extensively involved in the 9 settlement agreement matters referred to herein above. Darren and I were

A handwritten signature in black ink, consisting of a stylized 'G' followed by a long, sweeping horizontal line that ends in a small upward hook.

“at our wits end” and the “looming” hearing date for the LSNP Application was of enormous concern.

49. The attorney colleague that introduced Cameron to me ultimately prevailed upon Cameron to represent the Firm, Darren and myself in the LSNP Application and the Graham Counter Application. This arrangement took place shortly prior to the 16<sup>th</sup> November 2016, Cameron having advised me that the complexity and enormous amount of legal services that would have to be rendered only permitted him to commence with the rendering of initial legal services aimed at understanding these applications (perusing and considering same and the merits thereof) and more specifically eventually, if necessary, to seek the postponement of the hearing of the LSNP Application (the only application that had been enrolled for a hearing and as directed by Judge Ledwaba) – Cameron also agreed to continue with representing the Firm, Darren and myself after the 6<sup>th</sup> December 2016 and hopefully, and in the event that the hearing of the LSNP Application and the Graham Counter Application did not occur on that date.

50. As regards Cameron representing the Firm, Darren and myself I draw attention to the following:-

50.1. on the 23<sup>rd</sup> November 2016, Cameron, under cover of a communication addressed to the LSNP Attorneys, dated the 23<sup>rd</sup> November 2016, a copy whereof I annex hereto as **Annexure FA 27**, served a notice of intention to oppose, a copy whereof I annex hereto as Annexure FA 28; and



50.2. on the 27<sup>th</sup> November 2016, Cameron addressed a communication to the LSNP attorneys, a copy whereof I annex hereto as **Annexure FA 29**. In Annexure FA 29 Cameron recorded that Annexure FA 28 had been served on the LSNP attorneys in order to place himself on record as the Firm, Darren and my attorney of record and specifically recorded that this act was in no way to be construed **as constituting confirmation** that the LSNP papers had been served on us.

**THE APPLICANTS' INABILITY TO IDENTIFY AND TO INSTRUCT A FORENSIC ACCOUNTANT TO RESPOND TO THE SECOND LSNP REPORT**

51. The problems and the reasons therefor that Darren and I experienced in identifying as a suitable attorney to represent the Firm, Darren and myself in opposing the LSNP Application and the Graham Counter Application also extended to the identification and mandating of a suitable forensic accountant.

52. During the week of the 14<sup>th</sup> November 2016, the services of Mrs Brenda Anderson of B L Anderson CA (SA) Inc. (herein after referred to by me as "Brenda" - a forensic specialist accountant) were secured and for the purposes of generating a report in response to the First LSNP Report and the Second LSNP Report. Arising from her mandate, Brenda addressed a communication to me dated the 25<sup>th</sup> November 2016, a copy whereof is annexed hereto as **Annexure FA 27**.

53. Brenda has been furnished with the following documents:-



53.1. the First LSNP Report and **Bezuidenhout's** responses thereto; and

53.2. the Second LSNP Report; and

53.3. all of the annexures to the First LSNP Report and the Second LSNP Report;  
and

53.4. a Rule 35 (12) notice in the LSNP Application.

54. Cameron has advised me that he has discussed the parameters of the mandate that Brenda is to execute and that she has advised him that she would be able to furnish him with a very basic interim report and which report would include an estimate of the time period within which she would execute the mandate and the date upon which she expects to be able to generate a final report – this document will only be made available to Cameron on the 5<sup>th</sup> December 2016 and with instructions to make this available to the presiding Judges and the LSNP attorneys and the Grahams' attorney.

#### **PREPARATION FOR HEARINGS**

55. As I have indicated hereinabove, Cameron is unable to effectively and professionally appear at the hearing relating to the LSNP Application (with counsel). Accordingly, Cameron has prepared this postponement application and an application to declare that the LSNP Application papers have not been served on Darren and myself and accordingly the enrolment of the LSNP Application for a hearing on the 6<sup>th</sup> December 2016 is irregular and not in terms of the Uniform Rules of Court.



56. In executing his mandate, Cameron has performed the following tasks:-

56.1. attended at the offices of the LSNP and for the purposes of inspecting the control files that the Curator has in his possession, which control files relate to and are referred to in the Second LSNP Report (only 12 of the 25 control files indicated in the Second LSNP Report were made available to him, the other control files, except 1, were not in the Curator's possession, he having no knowledge as to the whereabouts of these other control files); and

56.2. has requested the LSNP to permit Brenda to be furnished with a mirror image of the computerised accounting records of the Firm that is in the possession of the Curator.

57. I annex hereto as **Annexure FA 28**, a copy of the Rule 35 (12) notice and which the LSNP attorneys have not responded to (the information and more particularly the documents sought in this notice are both relevant and important in order that Brenda may have access thereto and for the purposes of determining the veracity of the contents of the Second LSNP Report).

58. I annex hereto as **Annexure FA 29**, a communication addressed by Cameron to the LSNP and in which communication Cameron requested that the LSNP make available to Brenda a duplicated image of the computerised accounting records of the Firm – the LSNP has not responded to Annexure FA 29 and its failure to respond is resulting in obvious prejudicial consequences to Darren and myself.



**COMMUNICATIONS BETWEEN CAMERON AND THE ATTORNEYS FOR THE  
LSNP AND THE GRAHAMS**

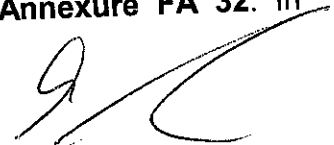
59. On the 27<sup>th</sup> November 2016, Cameron addressed a communication to the LSNP attorneys, a copy whereof I annex hereto as **Annexure FA 30**. In Annexure FA 30, Cameron requested the LSNP attorneys to agree to a postponement of the hearings on the 6<sup>th</sup> December 2016 and more specifically for the reason that Cameron and his counsel were not prepared to argue same and more specifically for a number of reasons including, *inter alia*, that:-

59.1. a forensic report of his forensic auditor, which had been commissioned, would not be available, i.e. in response to the Second LSNP Report; and

59.2. information and more specifically documents, had been sought under and in terms of the provisions of Rule 35 (12) of the Uniform Rules of Court.

60. In response to Annexure FA 30 and in a communication dated the 30<sup>th</sup> November 2016, a copy whereof I annex hereto as **Annexure FA 31**, the LSNP attorneys refused to agree to a postponement of the LSNP Application – Cameron has not responded to the contents of that communication and the reasons why he has not done so and where its contents have not been addressed in this affidavit, then those contents must not be construed as an admission as to the correctness of same.

61. On the 28<sup>th</sup> November 2016, Cameron addressed a communication to the Graham attorneys, a copy whereof I annex hereto as **Annexure FA 32**. In





Annexure FA 32, Cameron requested the Graham attorneys to agree to a postponement of the hearings on the 6<sup>th</sup> December 2016 and more specifically for the reason that Cameron and his counsel are not prepared to argue same and more specifically for a number of reasons including, *inter alia*, that:-

61.1. a forensic report of his forensic auditor, which had been commissioned, would not be available, i.e. in response to the Second LSNP Report; and

61.2. information and more specifically documents that have been sought under and in terms of the provisions of Rule 35 (12) of the Uniform Rules of Court have not been made available.

62. In response to Annexure FA 32 and in a communication dated the 29<sup>th</sup> November 2016, a copy whereof I annex hereto as **Annexure FA 33**, the Grahams attorneys refused to agree to a postponement of the Graham Counter Application – Cameron has not responded to the contents of that communication and the reasons why he has not done so and where its contents have not been addressed in this affidavit, then those contents must not be construed as an admission as to the correctness of same.

### **ABSENCE OF PREJUDICE**

63. A reading of the affidavits deposed to by Attorney G van Niekerk on behalf of the Grahams (the founding affidavit in support of the Graham Counter Application and the consolidated replying affidavit to the answering affidavits of the LSNP and Darren, Bezuidenhout and myself, repeatedly and *ad nauseam* records that the

A handwritten signature in black ink, consisting of a stylized 'G' followed by a long, sweeping horizontal stroke.

general public is at risk whilst Darren and I continue practising as attorneys, i.e. if we were allowed to do so, Darren and I would continue to perpetuate our previous alleged misconduct in concluding common law contingency fee agreements with those members of the general public who instructed the Firm to act on their behalf (obviously not having the relevant knowledge concerning the history involving the Firm, Darren and myself and more specifically the court cases that we had been unsuccessfully involved in), i.e. there are accordingly no circumstances under which Darren and I could (and for that matter would) prevail upon members of the public to engage us and in that process, we prevailing upon them to enter into common law fee agreements).

64. In addition to that matter indicated in paragraph 62 above, Attorney G van Niekerk and again repeatedly and *ad nauseam* contended that the suspension of Darren and myself as practising attorneys was absolutely necessary in order to protect existing and ex-clients of the Firm, i.e. to thereby prevent Darren and my alleged misconduct, which misconduct included the destroying of evidence (the contents of the files of existing and ex-clients) **we deny – this misconduct is alleged to have been undertaken in order to** thereby frustrate and prejudice ex and current clients from determining the extent of their claims against the Firm and Darren and myself – for the record, Darren and I have not brought about and/or destroyed client files and/or records.

65. It is common cause that Darren and I have been suspended from practising as attorneys and we have given effect to such suspension, i.e. we have not practised as attorneys since our suspension and our presence in Australia (including the

A handwritten signature in black ink, consisting of a stylized 'G' followed by a long, sweeping horizontal stroke that curves upwards at the end.

appointment of the Curator) does not enable us to access files of current and ex-clients of the Firm.

66. By virtue of the foregoing it is both untenable and unjust that the Grahams (and more particularly their attorney) and the LSNP and the LSNP attorneys to adopt the attitude that Darren and I must be finally struck from the roll of attorneys on the 6<sup>th</sup> December 2016.
67. It is patently obvious that the refusal by the Grahams and the LSNP to agree to a postponement of the LSNP Application and the Graham Counter Application (if it has in fact been enrolled properly for a hearing on the 6<sup>th</sup> December 2016, which I dispute) is unreasonable given the circumstances that prevail and the difficulties that Darren and I have experienced, i.e. at great distance to identify suitable legal representatives and a forensic accountant.
68. I furthermore draw attention to and record that notwithstanding van Niekerk's irresponsible and unsubstantiated allegations of over-reaching (including the unlawful retention of monies that we have been paid by ex-clients of the Firm, i.e. the transfer of trust amounts from the Firm's trust bank account into the Firm's business account as a consequence of fees in the various matters being debited), there has been not 1 instance where ex-clients of the Firm have lodged any claims with the Fidelity Fund of the LSNP. It is furthermore self-evident that the Second LSNP Report has never indicated any shortfall in the Firm's trust account and this fact should be taken into account in determining whether Darren and I have ever exposed our ex-clients to any adverse financial exposure.



### **SUBMISSIONS AND CONTENTIONS**

69. Darren and I submit and contend that it is in the interests of justice that we be granted the relief sought in our notice of motion. It has always been the intention of Darren and myself to oppose the Graham Counter Application and the LSNP Application and thereby to have our suspension set aside and at the same time to expose the unlawful and corrupt conduct of any number of persons who have participated in ensuring the launch of these proceedings and for ulterior motives and/or reasons.

**WHEREFORE** Darren and I pray that it may please the above Honourable Court to grant us the relief we seek in the notice of motion to which this my affidavit is annexed.

  
\_\_\_\_\_  
**RONALD BOBROFF**

I certify that the deponent has affirmed that he knows and understands the contents of this affidavit which was signed and sworn to before me at Sydney Australia on this the 5<sup>th</sup> day of December 2016 in compliance with the Laws of New South Wales, Australia.

Before me: MICHELLE THADLEY (Name of witness)

Signature of witness:

  
\_\_\_\_\_



## APOSTILLE

(in terms of the Hague Convention dated 5<sup>th</sup> October 1961)

1. Country : Australia

This apostille has been signed by

2. Michelle T Hadley  
NSW JP 201626

3. acting in the capacity as: ~~Notary/Justice of the Peace/Commissioner of Oaths~~

4. which bears the ~~seal/~~ stamp of the  
~~Notary/Justice of the Peace/ Commissioner of-~~  
~~Oaths~~

Certificate

5. at Sydney, Australia

6. on the ...5.... December 2016

7. by: MICHELLE T HADLEY

8. Registration Number (if any): 201626

9. that person whose signature appears  
hereinabove was appended by him in my  
presence I satisfying myself as to his identity.

10. Signature: *Michelle T Hadley*  
STAMP OF THE NOTARY/JUSTICE OF THE  
PEACE/COMMISSIONER OF OATHS



**IN THE HIGH COURT OF SOUTH AFRICA**  
**(GAUTENG DIVISION, PRETORIA)**

**CASE NO: 20066/2016**

In the matter between:

**RONALD BOBROFF**

First Applicant

and

**DARREN RODNEY BOBROFF**

Second Applicant

and

**THE LAW SOCIETY OF THE NORTHERN PROVINCES**

First Respondent

**JENNIFER GRAHAM**

Second Respondent

**MATTHEW GRAHAM**

Third Respondent

**STEPHEN DEREK BEZUIDENHOUT**

Fourth Respondent

**IN RE:**

**CASE NO: 20066/2016**

**THE LAW SOCIETY OF THE NORTHERN PROVINCES**

Applicant

and

**RONALD BOBROFF**

First Respondent

**DARREN RODNEY BOBROFF**

Second Respondent

  
Michelle T Hadley  
NSW JP 201626

29  
2

**STEPHEN DEREK BEZUIDENHOUT**

Third Respondent

**RONALD BOBROFF AND PARTNERS INC.**

Fourth Respondent

**JENNIFER GRAHAM**

Fifth Respondent

**MATTHEW GRAHAM**

Sixth Respondent

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**CONFIRMATORY AFFIDAVIT**

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I, the undersigned

**DARREN BOBROFF**

do hereby make oath and state:

1. I am the Second Applicant in these proceedings and am a major male legal practitioner (although currently having been suspended from practicing as an attorney) and am temporarily residing at 11 Shannon Street, St. Ives, Sydney, Australia.
2. The facts herein contained are, save or where otherwise indicated, within my own personal knowledge and are true and correct.
3. I have read the affidavit of Ronald Bobroff dated the 5<sup>th</sup> December and I confirm the contents thereof insofar as they relate to me.

  
**DARREN BOBROFF**



I certify that the deponent has affirmed that he knows and understands the contents of this affidavit which was signed and sworn to before me at Sydney Australia on this the 5<sup>th</sup> day of December 2016 in compliance with the Laws of New South Wales, Australia.

Before me:

MICHELLE HADLEY (Name of witness)

Signature of witness:

Michelle T Hadley

**APOSTILLE**  
(in terms of the Hague Convention dated 5<sup>th</sup> October 1961)

1. Country : Australia  
This apostille has been signed by
2. Michelle T Hadley  
NSW JP 201626
3. acting in the capacity as: Notary/Justice of the Peace/Commissioner of Oaths
4. which bears the seal/- stamp of the  
Notary/Justice of the Peace/Commissioner of Oaths
5. Certificate  
at Sydney, Australia
6. on the 5..... December 2016
7. by: MICHELLE T HADLEY
8. Registration Number (if any): 201626
9. that person whose signature appears  
hereinabove was appended by him in my  
presence I satisfying myself as to his identity.
10. Signature: Michelle T Hadley  
**STAMP OF THE NOTARY/JUSTICE OF THE  
PEACE/COMMISSIONER OF OATHS**



FA 31

**TAKE FURTHER NOTICE** that applicant has appointed the offices of its attorneys, **ROOTH & WESSELS INC** of Walker Creek Office Park, Second Floor, Walker Creek 2, 90 Florence Ribeiro Avenue, Muckleneuk, Pretoria which it will accept notice and service of all process in these proceedings.

**TAKE FURTHER NOTICE** that if the first, second and third respondents intend opposing this application, they are required:

- (a) to notify applicant's attorneys in writing thereof within 5 (five) days after service of this application;
- (b) within 15 (fifteen) days of notifying applicant of his intention to oppose the application to deliver his answering affidavit (if any) together with any relevant documents.

**AND FURTHER** that the first, second and third respondents are required to appoint in such notification an address as contemplated in rule 6(5)(d) at which he will accept notice and service of all documents in these proceedings.

**IF NO SUCH NOTICE OF INTENTION TO OPPOSE** is given, the application will be set down for hearing on a date to be allocated by the Registrar.

Dated at Pretoria on this 10<sup>th</sup> day of March 2016

ROOTH & WESSELS  
ATTORNEYS



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FA: 3

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**ROOTH & WESSELS INC**  
Attorneys for the Applicant  
Walker Creek Office Park  
Second Floor, Walker Creek 2  
90 Florence Ribeiro Street  
Muckleneuk  
Pretoria  
REF A BLOEM/es/MAT25883

TO: The Registrar of the High Court  
**PRETORIA**

AND TO: **RONALD BOBROFF**  
1<sup>ST</sup> Respondent  
RONALD BOBROFF & PARTNERS INC ATTORNEYS  
No 37 Ashford Road  
Parkwood  
JOHANNESBURG

**SERVICE BY SHERIFF**

**DARREN BOBROFF**  
2<sup>ND</sup> Respondent  
RONALD BOBROFF & PARTNERS INC ATTORNEYS  
No 37 Ashford Road  
Parkwood  
JOHANNESBURG

**SERVICE BY SHERIFF**

**STEPHEN DEREK BEZUIDENHOUT**  
3<sup>RD</sup> Respondent  
RONALD BOBROFF & PARTNERS INC ATTORNEYS  
No 37 Ashford Road  
Parkwood  
JOHANNESBURG

---

**ROOTH & WESSELS**  
ATTORNEYS



33  
FAY

**Andre Bloem**

**From:** Simon Weber  
**Sent:** 11 March 2016 17:11  
**To:** rael@taitz.co.za  
**Subject:** THE LAW SOCIETY OF THE NORTHERN PROVINCES / RONALD BOBROFF / DARREN RODNEY BOBROFF / STEPHEN DEREK BEZUIDENHOUT / RONALD BOBROFF & PARTNERS INC / JENNIFER GRAHAM / MATTHEW GRAHAM  
**Attachments:** Bobroff (1).pdf; Bobroff (2).pdf; Bobroff (3).pdf  
**Importance:** High

Dear Sir,

We attach hereto a notice of motion and founding affidavit for the striking of the first, second and third respondents from the roll of attorneys for your consideration.

Kindly indicate whether you will be prepared to accept service of the said application on behalf of your clients.

Regards,  
Simon Weber



**ROOTH & WESSELS**  
ATTORNEYS



Simon Weber  
Candidate Attorney  
Walker Creek Office Park  
90 Florence Ribeiro Avenue  
Muckleneuk, Pretoria

Tel: +27 12 452 4019  
Fax: +27 86 612 4936  
E-mail: [simonw@roothwessels.co.za](mailto:simonw@roothwessels.co.za)  
Visit us at: <http://www.roothwessels.co.za>

*[Handwritten signature]*

# **Taitz & Skikne**

ATTORNEYS  
PROKUREURS

ROSEBANK OFFICE  
2<sup>nd</sup> FLOOR, THE PARKS  
CNR WELLS AND JAN SMUTS AVENUE  
PARKWOOD, 2193

P O BOX 60  
GERMISTON, 1400

DOCEX 1, GERMISTON

TEL: 011 502 7800

FAX: 086 6794140

E-MAIL: [info@taitz.co.za](mailto:info@taitz.co.za)

GERMISTON OFFICE  
54 CHAPMAN ROAD

LAMBTON, GERMISTON SOUTH, 1400

P. O. BOX/POSBUS 60  
GERMISTON 1400

DOCEX 1, GERMISTON

TEL: 011 824-5444

FAX: 086 6794140

E-MAIL: [litigation@taitz.co.za](mailto:litigation@taitz.co.za)

John Joseph Finlay Cameron  
Hurlingham Office Park  
Block G  
Ground Floor  
Corner William Nicol and Republic Roads  
SANDTON

John Cameron

8 September 2016

Dear Mr Cameron

**RE: GRAHAM/LAW SOCIETY/BOBROFF**

1. We refer to your letter dated 8<sup>th</sup> September 2016.
2. We would like to clarify our position so that there is no confusion, and everyone is on the same page.
3. We were only formally attorneys of record in the Graham matter, when we took the matter over from Webber Wentzel.
4. The offices of Rontgen were the Pretoria correspondent in the matter from the outset, and we continued to use them.

34  
FAS

- 35
5. After the meeting with the Deputy Judge President a few weeks ago, we instructed Rontgen to file on our behalf a notice of withdrawal as an attorney of record. We don't know where the typing error emanated from which reflected the withdrawal as being out of the South Gauteng High Court, as the matter has always been out of the Pretoria division and I have instructed our offices to rectify same and serve a further notice of withdrawal and ensure that same is received by the offices of the DJP Ledwaba who is overseeing the matter. The DJP's directive includes the service of all pleadings and notices on his office as well. I previously sent you the last directive in relation to the matter and our offices regard our involvement in the matter as complete.
  6. Shortly before the ventilation of the Graham matter in March this year, the Law Society launched their own application to strike out Bobroffs and Bezuidenhout under case number 2006/2016 out of the Pretoria High Court. The application was served informally on me via email, with a request that I accept service by email. I did not agree thereto and advised the Law Society both verbally (and I think in writing) that I had no instructions to accept service by email.
  7. I was also not instructed on the matter at all by the Bobroffs, and have no mandate to act in the matter. I am however aware that this matter is enrolled for the 6<sup>th</sup> December 2016 and it appears that you have now received a copy of the Law Society application from Rooth and Wessels. We are not in possession of such a copy and there has never been formal service on our office of the application, as the Bobroffs did not wish to instruct us to place ourselves on record for purpose of accepting service.
  8. We are accordingly not on record for the Law Society application and have never been on record as acting for the Bobroffs or any other party.
  9. The confusion may arise as a result of the fact that certain of the relief sought in the Graham matter was deferred to be heard together with the Law Society application and in essence the balance of the relief which was not granted by the court in the Graham matter, namely the striking from the roll of the directors, is now going to be ventilated in the Law Society application. Accordingly, and to some extent the Graham matter has been joined with the Law Society matter, and I have no doubt that the Grahams legal team will be making representations on the 6<sup>th</sup> December 2016 as well.
  10. As we have withdrawn as attorneys acting on behalf of the Bobroffs, we have no intention in involving ourselves further in the matter.
  11. In relation to your request for the files in relation to the Graham matter, there may be some misunderstanding of the factual position, which we will clear up.
  12. When we occupied the office space at RBP between March and June 2016, all the files in the Graham matter were at the office. The files were voluminous and constituted many lever arch files and there were copies and duplicates all over the place and scattered in and amongst the offices, primarily in Ronald's office and the office of his secretary Rochelle who was supposed to keep all his personal litigation files in one section.
- 9

- 36
13. At a certain point Rochelle moved most of the litigation files to the section where Darren had occupied offices.
  14. At a certain stage David Bayliss who was representing the Bobroffs in the criminal matter attended at the offices and was given one or two of the lever arch files which he required for preparation in the criminal matter.
  15. Before we vacated the premises, Bobroff sent an instruction that the files in his office and other personal files be packaged and sent to his house, and he had the intention of sending them across to Australia so he could work on them and prepare for his criminal and civil defence. The messenger delivered box loads of files to his house and his daughter also collected numerous boxes of files.
  16. In addition Rochelle moved some of the files from her office and Ronald's office, to Darren's office and there was an entire section in the reception area of Darren's office stacked full of personal files.
  17. When we vacated the RBP premises, we did not take with us any of the files involving the Graham litigation, as it was clear that we would no longer be acting for Bobroff and most of the files had been moved out in any event. We don't have the files in our possession.
  18. We are further aware that advocate Nazeer Cassim SC sent his files back to the Bobroff office, and we believe that Adv V September did likewise. You are welcome to make enquiries with them, as to whether they have any files in their possession. It is also recommended that you contact attorney David Bayliss to see which files he has.
  19. The bulk of the files will be located either at the old offices of Ronald Bobroff and Partners Inc., or his residence, and we have nothing at our offices except a control file with the latest correspondence.

Regards

  
**TAITZ & SKIKNE**

PROPRIETOR: RAE L ZIMERMAN B.A. (HONS) LLB  
PROFESSIONALLY ASSISTED BY:  
VANESSA VALENTE: B.A. LLB;  
PHILIPPA JANE LEISEGANG: B.A. LLB; MARIANGELA VENTURI: B COM LAW, LLB, H Dip (Tax);  
VAT REG. NO. 4660172976

9/10

25-08-18:03:22PM:



OFFICE OF THE DEPUTY JUDGE PRESIDENT

HIGH COURT OF SOUTH AFRICA, GAUTENG PROVINCIAL DIVISION, PRETORIA

Gauteng High Court Building, Cnr. Madiba (Vermeulen) & Paul Kruger Str, Room 7.15, Seventh Floor  
Tel. (012) 315 7572 – Fax. (012) 315 7600 – Direct Fax. 0864086021 – E-mail: MTroskie@judiciary.org.za

24 AUGUST 2016

TO: **ROOTH & WESSELS ATTORNEYS**  
Email: AndreB@roothwessels.co.za  
Your Ref: A Bloem/es/MAT24951  
Our Ref: 2006/16/DJP LEDWABA/MT

TO: **EDWARD NATHAN SONNENBERGS**  
Email: gvanniekerk@ensafrica.com  
Your Ref: George van Niekerk  
Our Ref: 2006/16/DJP LEDWABA/MT

TO: **TAITZ & SKIKNE**  
Email: rael@taitz.co.za  
Your Ref: Mr Rael Zimerman  
Our Ref: 2006/16/DJP LEDWABA/MT

Dear Sirs

RE: **SPECIAL MOTION: LAW SOCIETY OF THE NORTHERN PROVINCE / Mr  
BEZUIDENHOUT / RONALD BOBROFF & PARTNERS INC  
CASE NO: 2006/16**

1. The meeting held at my chambers on 18 August 2016 refers.
2. As discussed you may set this matter down as a special motion on 6 DECEMBER 2016. Please attach a copy of this letter to your notice of set down and serve it on all the parties immediately and filed at the Office of the Deputy Judge President, 7<sup>th</sup> Floor, Room 7.15. Furthermore I need written

confirmation from your office within 7 (seven) days after receipt hereof that a notice of set down, together with a copy of this letter, has been served and filed.

3. Please note that I further directed that:

3.1 The respondent should file his answering affidavit by no later than 30 SEPTEMBER 2016.

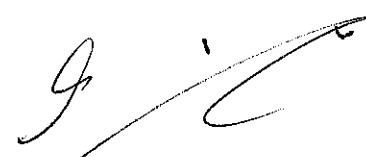
3.2 The applicant should file its replying affidavit by no later than 28 OCTOBER 2016.

3.3 The applicant should file its heads of argument and practice note by no later than 11 NOVEMBER 2016.

3.4 The respondent should file his heads of argument and practice note by no later than 25 NOVEMBER 2016.

4. For proper administration and allocation of special motions, the applicant should deliver to my office the court file duly indexed and paginated and also send via email a Joint Practice Note which should be served on the respondents for comment or to supplement same by no later than 28 NOVEMBER 2016 containing the following:

- Names of the parties and the case number
- Names and telephone numbers of all counsel in the Motion
- Nature of the motion
- Issues to be determined in the application
- Relief sought at the hearing by the party on whose behalf counsel is appearing
- An estimate of the probable duration of the application
- Number of pages in the application and whether or not all





25-08-18:03:22PM;

# 3/

papers need to be read and if not, which portion need not be read

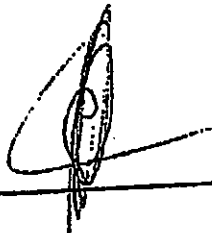
5. The aforesaid dates must be strictly adhered to, failing which the matter may not proceed on the date allocated, however depending on why there was non-compliance. All documents and the court file must be filed at the office of the Deputy Judge President on the 7th floor, High Court.

- ~~6. It remains the duty of the all legal representatives to ensure that the court file has been properly indexed and paginated in time and that all documents have been filed accordingly in time.~~

7. Should it, for any reasons, transpire that this matter will not proceed on the given date, you are directed to inform the Registrar's office as well as the Office of the Deputy Judge President, immediately.

8. None availability of counsel representing any of the parties shall simply not be allowed as a reason for the matter not to proceed on the date of hearing arranged with my office.

Regards



A P LEDWABA  
DEPUTY JUDGE PRESIDENT  
HIGH COURT OF SOUTH AFRICA  
GAUTENG DIVISION, PRETORIA



40

- FIA

**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@mweb.co.za](mailto:johncam@mweb.co.za)**  
**Docex 7, Norwood**

---

Your Ref: Rael Zimmerman  
Our Ref: J Cameron/attorneys/Taitz/Bobroff- LSNP- Case No 2006/16 &  
61790/12  
Date: 8 September 2016

**TAITZ AND SKIKNE ATTORNEYS**  
**2<sup>ND</sup> FLOOR, THE PARKS**  
**CNR WELLS AND JAN SMUTS AVEUNE**  
**PARKWOOD**

**P O Box 60, Germiston 1400**  
**Docex 1, Germiston**

**TELEFAX NO: 086 679 4140**  
**TELEPHONE NO: 011 824 5444**  
**EMAIL: [rael@taitz.co.za](mailto:rael@taitz.co.za)**  
**EMAIL: [info@taitz.co.za](mailto:info@taitz.co.za)**

Dear Rael

**RE: APPLICATION BY JENNIFER AND MATTHEW GRAHAM ("THE GRAHAMS") IN ORDER TO HAVE RONALD BOBROFF AND DARREN RODNEY BOBROFF ("THE BOBROFFS") AND STEPHEN DEREK BEZUIDENHOUT ("SB") REMOVED FROM THE ROLL OF ATTORNEYS - HIGH OF SOUTH AFRICA - GAUTENG DIVISION- PRETORIA - CASE NO 61790/2012 ("THE FIRST APPLICATION")**  
**RE: APPLICATION BY THE LAW SOCIETY OF THE NORTHERN PROVINCES ("LSNP") IN ORDER TO HAVE RONALD BOBROFF AND DARREN RODNEY BOBROFF ("THE BOBROFFS") AND STEPHEN DEREK BEZUIDENHOUT ("SB") REMOVED FROM THE ROLL OF ATTORNEYS - HIGH OF SOUTH AFRICA - GAUTENG DIVISION- PRETORIA - CASE NO 2006/2016 ("THE SECOND APPLICATION")**

We refer to the First Application and the Second Application and more specifically to the notice of set down dated the 26<sup>th</sup> August 2016 which was served on Rontgen and



TAITZ AND SKIKNE  
8 SEPTEMBER 2016

41  
PAGE 2

Rontgen Inc. on the 26<sup>th</sup> August 2016, which notice you have transmitted to ourselves.

At the outset we record that we have not received any formal instructions from the Bobroffs insofar as acting for them either in the First Application or the Second Application (we have received from Rooth & Wessels Inc. a copy of the Second Application and more specifically the notice of motion and founding affidavit with annexures).

In anticipation of receiving instructions from the Bobroffs we confirm the writer having requested your Mr Rael Zimmerman ("Rael") to be furnished with all of the papers in the First Application (Rael having indicated that he has at your Germiston offices approximately 14 lever arch files) – kindly and urgently advise as to whether these files are available for collection from your Johannesburg office.

As regards the notice of set down served by Rooth & Wessels Inc. on you we are somewhat confused by this service – Rael having advised the writer that at no stage did you represent the Bobroffs in regard to the Second Application and only represented them in the First Application – could you clear up this confusion?

In closing we request that you furnish ourselves with a copy of your notice of withdrawal of attorneys of record as regards the Bobroffs in respect of the First Application (the attorneys for the Grahams having indicated that you have served on them such a notice).

You are requested to acknowledge receipt hereof and we now await your advices hereto.

Yours faithfully

J J F CAMERON



42  
FAS

**IN THE HIGH COURT OF SOUTH AFRICA**  
**GAUTENG DIVISION, PRETORIA**

Case No: 2006/2016

In the application by:

**THE LAW SOCIETY OF THE NORTHERN PROVINCES**

Applicant

and

**RONALD BOBROFF**

**DARREN RODNEY BOBROFF**

**STEPHEN DEREK BEZUIDENHOUT**

**RONALD BOBROFF & PARTNERS INC**

**JENNIFER GRAHAM**

**MATTHEW GRAHAM**

1<sup>st</sup> Respondent

2<sup>nd</sup> Respondent

3<sup>rd</sup> Respondent

4<sup>th</sup> Respondent

5<sup>th</sup> Respondent

6<sup>th</sup> Respondent


---

**NOTICE OF SET DOWN – SPECIAL MOTION**

---

**BE PLEASED** to take notice that the special motion is hereby set down for hearing on **6 DECEMBER 2016 at 10:00** in accordance with the directives issued by the Deputy Judge President Ledwaba dated 24 August 2016, a copy of which is attached hereto.

Dated at Pretoria on this 26<sup>th</sup> day of August 2016

  
**ROOTH & WESSELS INC**  
Attorneys for the Law Society  
Walker Creek Office Park  
Second Floor, Walker Creek 2  
90 Florence Ribeiro Street  
Muckleneuk, Pretoria  
Tel: 012-452-4000  
Ref: Mr A Bloem/es/MAT27334



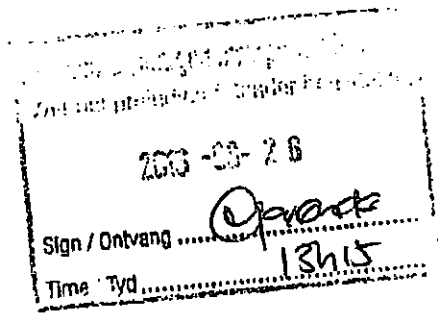
43

TO:

The Registrar of the High Court  
**PRETORIA**

AND TO:

**TAITZ & SKIKNE**  
Attorneys for 1<sup>st</sup> 2<sup>nd</sup> & 4<sup>th</sup> respondents  
Rosebank Office  
2nd Floor, The Parks  
Cnr Wells and Jan Smuts Avenue  
Parkwood  
2193  
E-mail: [info@taitz.co.za](mailto:info@taitz.co.za)  
E-mail: [litigation@taitz.co.za](mailto:litigation@taitz.co.za)  
Tel: 011 502 7800  
Fax: 086 679 4140  
Ref: Mr R Zimmerman  
**C/O RONTGEN & RONTGEN**  
**INCORPORATED**  
HB Forum  
13 Stamvrug Street, Val de Grace  
Pretoria  
[vheerden@hblaw.co.za](mailto:vheerden@hblaw.co.za)  
Tel: 012 481 3555  
Fax: 086 673 2454  
Ref: Mr KM Rontgen snr



Received a copy hereof on this  
\_\_\_\_ day of August 2016

AND TO:

**BRUGMANS INCORPORATED**  
Attorneys for 3<sup>rd</sup> respondent  
Tel: 011 354 9000  
Fax: 086 508 0224  
E-mail: [teejayf@brugmans.co.za](mailto:teejayf@brugmans.co.za)  
Ref: Mr TJ Fagri/Ms da Silva  
**C/o SANET DE LANGE ATTORNEYS**  
1 Ox Street, Cnr of Brooks and Ox Street  
Menlo Park, Pretoria  
TEL: 012 362 3970  
Fax: 012 362 7110  
E-mail: [sdlprok@mweb.co.za](mailto:sdlprok@mweb.co.za)  
Ref: S de Lange/al/SA5794

Received a copy hereof on this  
\_\_\_\_ day of August 2016

44

3

AND TO:

**EDWARD NATHAN SONNEBERGS**  
Attorneys for 5<sup>th</sup> and 6<sup>th</sup> respondents  
Ref: G van Niekerk  
**C/o WEAVID & WEAVID INC**  
Block E, Glenfield Office Park  
Oberon Street  
Faerie Glen  
Pretoria  
E-mail: [seany@weavind.co.za](mailto:seany@weavind.co.za)

Received a copy hereof on this  
28 day of August 2016

Nothing 12:35

9/

# **Taitz & Skikne**

ATTORNEYS  
PROKUREURS

ROSEBANK OFFICE  
2<sup>nd</sup> FLOOR, THE PARKS  
CNR WELLS AND JAN SMUTS AVENUE  
PARKWOOD, 2193

P O BOX 60  
GERMISTON, 1400

DOCEX 1, GERMISTON

TEL: 011 502 7800

FAX: 086 6794140

E-MAIL: [info@taitz.co.za](mailto:info@taitz.co.za)

GERMISTON OFFICE  
54 CHAPMAN ROAD

LAMBTON, GERMISTON SOUTH, 1400

P. O. BOX/POSBUS 60  
GERMISTON 1400

DOCEX 1, GERMISTON

TEL: 011 824-5444

FAX: 086 6794140

E-MAIL: [litigation@taitz.co.za](mailto:litigation@taitz.co.za)

John Joseph Finlay Cameron  
Hurlingham Office Park  
Block G  
Ground Floor  
Corner William Nicol and Republic Roads  
SANDTON

John Cameron

8 September 2016

Dear Mr Cameron

**RE: GRAHAM/LAW SOCIETY/BOBROFF**

1. We refer to your letter dated 8<sup>th</sup> September 2016.
2. We would like to clarify our position so that there is no confusion, and everyone is on the same page.
3. We were only formally attorneys of record in the Graham matter, when we took the matter over from Webber Wentzel.
4. The offices of Rontgen were the Pretoria correspondent in the matter from the outset, and we continued to use them.

9

- 46
5. After the meeting with the Deputy Judge President a few weeks ago, we instructed Rontgen to file on our behalf a notice of withdrawal as an attorney of record. We don't know where the typing error emanated from which reflected the withdrawal as being out of the South Gauteng High Court, as the matter has always been out of the Pretoria division and I have instructed our offices to rectify same and serve a further notice of withdrawal and ensure that same is received by the offices of the DJP Ledwaba who is overseeing the matter. The DJP's directive includes the service of all pleadings and notices on his office as well. I previously sent you the last directive in relation to the matter and our offices regard our involvement in the matter as complete.
  6. Shortly before the ventilation of the Graham matter in March this year, the Law Society launched their own application to strike out Bobroffs and Bezuidenhout under case number 2006/2016 out of the Pretoria High Court. The application was served informally on me via email, with a request that I accept service by email. I did not agree thereto and advised the Law Society both verbally (and I think in writing) that I had no instructions to accept service by email.
  7. I was also not instructed on the matter at all by the Bobroffs, and have no mandate to act in the matter. I am however aware that this matter is enrolled for the 6<sup>th</sup> December 2016 and it appears that you have now received a copy of the Law Society application from Rooth and Wessels. We are not in possession of such a copy and there has never been formal service on our office of the application, as the Bobroffs did not wish to instruct us to place ourselves on record for purpose of accepting service.
  8. We are accordingly not on record for the Law Society application and have never been on record as acting for the Bobroffs or any other party.
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  10. As we have withdrawn as attorneys acting on behalf of the Bobroffs, we have no intention in involving ourselves further in the matter.
  11. In relation to your request for the files in relation to the Graham matter, there may be some misunderstanding of the factual position, which we will clear up.
  12. When we occupied the office space at RBP between March and June 2016, all the files in the Graham matter were at the office. The files were voluminous and constituted many lever arch files and there were copies and duplicates all over the place and scattered in and amongst the offices, primarily in Ronald's office and the office of his secretary Rochelle who was supposed to keep all his personal litigation files in one section.
- 9



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17. When we vacated the RBP premises, we did not take with us any of the files involving the Graham litigation, as it was clear that we would no longer be acting for Bobroff and most of the files had been moved out in any event. We don't have the files in our possession.
18. We are further aware that advocate Nazeer Cassim SC sent his files back to the Bobroff office, and we believe that Adv V September did likewise. You are welcome to make enquiries with them, as to whether they have any files in their possession. It is also recommended that you contact attorney David Bayliss to see which files he has.
19. The bulk of the files will be located either at the old offices of Ronald Bobroff and Partners Inc., or his residence, and we have nothing at our offices except a control file with the latest correspondence.

Regards

R. Zimmerman  
**TAITZ & SKIKNE**

PROPRIETOR: RAE ZIMMERMAN B.A. (HONS) LLB  
PROFESSIONALLY ASSISTED BY:  
VANESSA VALENTE: B.A. LLB;  
PHILIPPA JANE LEISEGANG: B.A. LLB; MARIANGELA VENTURI: B COM LAW, LLB, H Dip (Tax);  
VAT REG. NO. 4560172976

CO148

FA10

**IN THE HIGH COURT OF SOUTH AFRICA  
GAUTENG DIVISION, PRETORIA**

**CASE NO: 61790/2012**

In the matter between:-

**JENNIFER GRAHAM**

**First Applicant**

**MATTHEW GRAHAM**

**Second Applicant**

and

**LAW SOCIETY OF THE NORTHERN PROVINCES**

**First Respondent**

**RONALD BOBROFF AND PARTNERS INC**

**Second Respondent**

**BOBROFF RONALD**

**Third Respondent**

**BOBROFF, DARREN**

**Fourth Respondent**

**WITHDRAWAL AS ATTORNEYS OF RECORD**

**BE PLEASED TO TAKE NOTICE THAT TAITZ & SKIKNE ATTORNEYS c/o  
RONTGEN & RONTGEN INC hereby withdraw from acting on behalf of the Second,  
Third and Fourth Respondents in the abovementioned matter.**

**TAKE NOTICE FURTHER that the last known addresses of the Second, Third and  
Fourth Respondents are 37 Ashford Road, Parkwood.**



**TAKE NOTICE FURTHER** that the attention of the Second, Third and Fourth Respondents are drawn to the provisions of Rule 16(4) of the Rules of the above Honourable Court reading as follows:-

- "(4) (a) Where an Attorney acting in any proceedings for a party ceases so to Act, he shall forthwith deliver notice thereof to such party, the Registrar and all other parties, provided that notice to the party for whom he acted may be given by registered post.
- (b) After such notice, unless the party formerly represented within 10 (TEN) days after the notice, himself notifies all other parties of a new address for service as contemplated in sub-rule (2), it shall not be necessary to serve any documents upon such party unless the Court otherwise orders, provided that any of the other parties may before receipt of the notice of his new address for service of documents, serve any documents upon the party who was formerly represented.
- (c) The notice to the Registrar shall state the names and addresses of the parties notified and the date on which and the manner in which the notice was sent to them.
- (d) The notice to the party formerly represented shall inform the said party to the provisions of Paragraph (b)."



50

**TAKE NOTICE FURTHER** that the attention of the Respondents are drawn to the provisions of Rule 16(2)(a) and (b) of the Rules of Court, reading as follows:-

- "(2) (a) Any party represented by an Attorney in any proceedings may at any time, subject to the provisions of Rule 40, terminate such Attorney's authority to act for him and thereafter act in person or appoint another Attorney to act for him therein, whereupon he shall forthwith give notice to the Registrar and to all other parties of the termination of his former Attorney's authority and if he has appointed a further Attorney so to act for him, of the latter's name and address.
- (b) If such party does not appoint a further Attorney, such party shall in the notice of termination of his former Attorney's authority also notify all other parties of an address within 8 kilometres of the office of the Registrar, or, if he is a person who is in terms of law prohibited from being the occupier of land or premises within the distance of 8 kilometres of such office, may notify an address further than 8 kilometres from such office but within the magisterial district in which such office is situated, for the service on him of all documents in such proceedings."

DATED at GERMISTON on this 12<sup>TH</sup> JULY 2016.

**(SGD) R. ZIMERMAN**  
**TAITZ & SKIKNE ATTORNEYS**  
Attorneys for Second, Third & Fourth  
Respondents



51

c/o RONTGEN & RONTGEN INC  
HB Forum, 13 Stamvrug Street  
Val de Grace  
Pretoria  
Tel: (012) 481-3555  
E-mail: [vrooyenn@rontgenlaw.co.za](mailto:vrooyenn@rontgenlaw.co.za)  
Ref: Mr KM Rontgen Snr

TO: THE REGISTRAR OF THE ABOVE HONOURABLE COURT  
PRETORIA

AND TO: RONALD BOBROFF AND PARTNERS INC  
Second Respondent  
37 Ashford Road  
Parkwood  
2121

PER REGISTERED POST

AND TO: RONALD BOBROFF  
Third Respondent  
37 Ashford Road  
Parkwood  
2121

PER REGISTERED POST

AND TO: DARREN RODNEY BOBROFF  
Fourth Respondent  
37 Ashford Road  
Parkwood  
2121

PER REGISTERED POST

AND TO: ROTH & WESSELS INC  
Attorneys for Applicants / First Respondent  
Walker Creek Office Park  
Walker Creek Two, Floor Two  
Muckleneuk  
Pretoria  
Tel: 012 452-4066  
Fax: 086 613 7242  
Ref: Mr A Bloem/sw/MAT24951

ROTH WESSELS  
P.O. Box 2265  
Brooklyn Square  
0075  
Tel: (012) 452 4066

Received copy hereof on this  
09 day of SEPTEMBER 2016.

 11:04  
For: Applicants' Attorneys



52

AND TO: **EDWARD NATHAN SONNENBERGS**  
Attorneys for Applicants in main application  
c/o WEAVIND & WEAVIND INC  
Block E, Glenfield Office Park  
Oberon Street  
Faerie Glen  
Pretoria  
Tel: 012 346-3098  
Fax: 086 618 4958  
Ref: S Van der Merwe/E98057

**WEAVIND & WEAVIND INC**  
REG NO: 1978/002814/21  
BLOCK E, GLENFIELD OFFICE PARK  
361 OBERON AVENUE  
FAERIE GLEN, PRETORIA  
TEL NO: 012 346 3098

Received copy hereof on this  
9 day of SEPTEMBER 2016.

Dmotlaung 10:36  
For: Applicants' Attorneys

9/2

**Attorney John Joseph Finlay Cameron**

---

53

**From:** Attorney John Joseph Finlay Cameron <johncam@mweb.co.za>  
**Sent:** 26 August 2016 08:50 AM  
**To:** 'elrinas@rwafrica.com'  
**Subject:** LSNP V Bobroffs

FA 11

I confirm that my messenger will collect from your offices the striking off application which is in the region of 1000 pages. I furthermore record that at this stage I am NOT the attorney of record for the Bobroffs – I need to familiarise myself with the application.  
Thank you.

You are requested to acknowledge receipt hereof and we await your advices hereto.


Attorney John Joseph Finlay Cameron  
Hurlingham Office Park  
Block G, Ground Floor  
Cnr William Nicol & Republic Roads  
(Entrance in Woodlands Avenue)  
Sandton

P O Box 41248  
Craighall 2024  
Telephone number: **011 285 0043**  
Fax number: 011 325 4780  
e-mail: [johncam@mweb.co.za](mailto:johncam@mweb.co.za)  
Cellular: 072 041 8818

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FA12

**IN THE HIGH COURT OF SOUTH AFRICA**  
**GAUTENG DIVISION, PRETORIA**

74240/16

Case No:

In the *ex parte* application of:

**THE LAW SOCIETY OF THE NORTHERN PROVINCE**

Applicant

Case number: 20066/2016

In re:

**THE LAW SOCIETY OF THE NORTHERN PROVINCE**

Applicant

and

**RONALD BOBROFF**

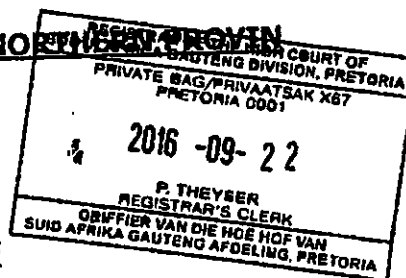
**DARREN RODNEY BOBROFF**

**STEPHEN DEREK BEZUIDENHOUT**

**RONALD BOBROFF & PARTNERS INC**

**JENNIFER GRAHAM**

**MATTHEW GRAHAM**



1<sup>st</sup> Respondent

2<sup>nd</sup> Respondent

3<sup>rd</sup> Respondent

4<sup>th</sup> respondent

5<sup>th</sup> Respondent

6<sup>th</sup> Respondent

---

**NOTICE OF MOTION**

---

**BE PLEASED TO TAKE NOTICE** that on 6 OCTOBER 2016 at 10:00 or  
so soon thereafter as the matter can be heard, application will be made to this  
Honourable Court, for an order in the following terms:

**RW**  
ATTORNEYS



1. that leave is granted authorising the Law Society to effect service by edictal citation on **Ronald Bobroff** and **Darren Rodney Bobroff** (first and second respondents) of the notice of set down relating to an application for the striking of their names from the roll of attorneys;
2. that the notice of set down should be served on Ronald Bobroff and Darren Rodney Bobroff either at No 26 Warimoo Street, St Ives, Sydney, New South Wales Australia or at No 11 Shannon Street, St Ives, Sydney, Australia;
3. that the notice of set down should be served by attorney Sher, Director, Drayton Sher Lawyers, 3 Spring Street, Sydney, New South Wales who is authorised to serve process in terms of Australian Law;
4. that the costs of this application be costs in the cause; and
5. that further and/or alternative relief be granted to the Law Society.

**TAKE NOTICE FURTHER** that the attached affidavit of the Vice President of the applicant, Sibusiso William Mavela Gule and annexures thereto will be used in support of this application.

**RW**  
ATTORNEYS



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**KINDLY ENROL THE MATTER FOR HEARING ACCORDINGLY.**

Dated at **PRETORIA** on this **21<sup>st</sup>** day of **September 2016**.

**ROOTH & WESSELS INC**  
Attorneys for the Law Society  
Walker Creek Office Park  
Second Floor, Walker Creek 2  
90 Florence Ribeiro Street  
Muckleneuk, Pretoria  
Tel: 012-452-4000  
Ref: Mr A Bloem/es/MAT27334

**RW**  
ATTORNEYS



5  
FAB

**RONALD BOBROFF  
& PARTNERS INC.**  
**THE MEDICAL MALPRACTICE AND  
PERSONAL INJURY CLAIM ATTORNEYS**  
Est. 1974

P.O. Box 1170  
Parklands  
2121  
Tel: (011) 880-6781 / 2 / 3  
Website: [www.bobroff.co.za](http://www.bobroff.co.za)  
E-mail address: [info@bobroff.co.za](mailto:info@bobroff.co.za)  
For prompt response: [ronaldb@bobroff.co.za](mailto:ronaldb@bobroff.co.za)

37 Ashford Road  
Rosebank  
2196  
Fax: (011) 880-6784  
Docex 153, Jhb

OUR REF:- MR R BOBROFF/rs

YOUR REF:-

30 July 2015

MR T GROBLER, DIRECTOR LSNP  
[SUSANL@lsnp.org.za](mailto:SUSANL@lsnp.org.za)  
MS M MALATJI, HEAD DISCIPLINARY DEPARTMENT  
THE LAW SOCIETY OF THE NORTHERN PROVINCES  
PER EMAIL [motila@lsnp.org.za](mailto:motila@lsnp.org.za)

Cc MR S S MADBIDA  
[smadiba@mweb.co.za](mailto:smadiba@mweb.co.za)

BY HAND – PER REGISTERED MAIL – PER EMAIL

Dear Sirs/Madam

**RE: COMPLAINT AGAINST ATTORNEY JEFFREY KATZ**

We advise as follows:

1. On 16 June 2015, at approximately 13:30 RBP Director, Darren Bobroff and his family including his two children and some friends were seated at the Grand Central Café Restaurant at Melrose Arch.

---

DIRECTORS: MANAGING - RONALD BOBROFF B.A. LL.B (WITWATERSRAND),  
STEPHEN BEZUIDENHOUT: B PROC (WITWATERSRAND);  
DARREN BOBROFF: B.A LLB (WITWATERSRAND),  
PROFESSIONALLY ASSISTED BY:  
VANESSA VALENTE: BA LLB ( WITWATERSRAND); PHILIPPA JANE LEISEGANG: B.A. LLB (UN);  
MARIANGELA VENTURI: B COM LAW, LLB, H Dip (Tax) (UJ);  
INTERNAL ACCOUNTANT: NATASCHA DA COSTA;  
ESTABLISHED 1974  
(Reg. No. 2001/021719/21 – Vat No. 463 0204974)

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sf

2. Discovery Health Administrators employee, Jeffrey Katz and his family were also patrons at the same restaurant. Katz walked up to the table at which Darren Bobroff and his family were seated and made the following threats and statements:
  - a. "You are going to jail";
  - b. "The Hawks are onto you and will be arresting you soon";
  - c. "You have no idea how many of your clients we have";
  - d. "The fund are investigating you and the CEO Eugene Watson hates you. I don't know why he hates you so much";
  - e. "We (Discovery) will never stop. We have unlimited money";
  - f. "I know about Van Der Merwe and the ten per cent you gave him";
  - g. "We know about your account in Hong Kong with R350 million";
  - h. "You have never won anything against us and Millar and by now you should know why";
  - i. "You briefed Hellen's because you need a criminal counsel";
  - j. "We will see to it, no matter what it takes, that the Grahams will never have to face Hellens at the Law Society";
  - k. "You should pay back the contingency fees money you stole from your clients to reduce your sentence";
  - l. "We have seen to it that Anthony Millar will be your next Law Society President and De Broglio, Vice President."
  - m. "You shouldn't waste your time lodging any more complaints against Millar. You must have realised by now, these will go nowhere as has been the case with all complaints you have lodged";
  - n. "Why do you think every complaint against you guys by us and Millar is acted on quickly and you are always before Committees?"
  - o. "We know exactly what happens and when it happens at Council meetings, and in the Disciplinary Department, and you would be very worried if I told you what our friends are doing for us at the Law Society".

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3. Darren Bobroff's children were extremely traumatised by Katz's statement "You are going to jail". In particular his youngest son, who is five years old, now won't leave his father's side, insists on sleeping with him, and weeps when Darren leaves for work.

3.1 Katz's threats in which he clearly speaks for his employer, Discovery Health, as noted in paragraphs 2c, e, g, h, j, l, n and o above, confirm, despite apparent perjury by its Attorney, Mr George Van Niekerk of ENS, Cape Town, as referred to below and in paragraph 5.1, that Discovery Health, through its in-house attorney/debt collector, Katz, is indeed behind every attack launched against the writer, Darren Bobroff and RBP Inc under the pretext of "assisting" RBP former client, Mr Graham, as also conspiring with Millar to attack our LSNP compliant common-law contingency fee agreements.

3.1.1 Discovery's Attorney, Mr George Van Niekerk of ENS, Cape Town had stated on oath in a 49 (11) application brought by him against the Law Society and the writer and the Practice of RBP on the 30 October 2014 under case no. 2012/61790 that, "I reiterate that Discovery Health is not a party to this litigation directly or indirectly".

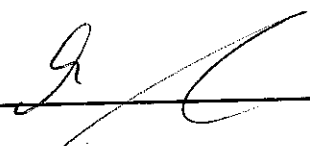
**DOCUMENTED AND CIRCUMSTANTIAL EVIDENCE OF DISCOVERY HEALTH'S VENDETTA AGAINST RONALD AND DARREN BOBROFF AND RBP INC, EXECUTED THROUGH ITS EMPLOYEE, MR JEFFREY KATZ, ITS ATTORNEY MR GEORGE VAN NIEKERK OF ENS CAPE TOWN, IN COLLUSION WITH PROXIES, MR ANTHONY MILLAR AND MR BEAMISH**

4. 4.1 Where reference has been made to subject matter in the above heading, this substantiates by reference below to specific portions of affidavits filed in Court by the Law Society, Van Niekerk and Mrs Graham, that what has actually occurred in various fora, and at the Law Society, during the four and a half year vendetta conducted by Discovery and its proxies; gives credence to the content of Mr Katz's threats and statements in paragraph 2 above.

4.2 It is surely no coincidence that Katz has been present in Court together with attorneys Millar and Berger, and Discovery proxy "reporter" Beamish, in every matter litigated against RBP by Millar. This notwithstanding that the litigation did not involve a Discovery member.

4.3 Similarly, it was no coincidence that Messrs Millar and Berger were seated together with Katz and Beamish in Court, during the arguing of matters in which Messrs Millar and Berger were not involved in any way whatsoever.

4.4 Having regard to the above, taken together with the fact that Millar, Katz and Beamish have consistently communicated with each other concerning attacks on



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the writer, Darren Bobroff and RBP Inc, via email, twitter and What's Apps, **INCLUDING** Millar's tweet to Katz and Beamish detailing the confidential LSNP Resolution, 26 June 2015, to inspect RBP's books; much of what Katz states in his threats resonates with what has actually occurred in various fora, and in respect of the special resolution at the LSNP AGM to force an election of the statutory councillors thereby creating an opportunity for Millar to become a councillor, and the subsequent special meeting of members events, within the Law Society Disciplinary Department concerning Millar/RBP, and the Council Resolution of the 26 June 2015.

5.

- 5.1 Whereas Mr Van Niekerk has stated on oath as referred to in paragraph 3.1.1 above that "I reiterate that Discovery Health is not a party to this litigation directly or indirectly", he has stated exactly the opposite in a press release issued by him on the 29 October 2012 headed "Statement by Mr George Van Niekerk, Director ENS" - "ENS (Edward Nathan Sonnenbergs) was instructed by Discovery Holdings to assist a number of the members of the Discovery Health Medical Scheme, who were former clients of Ronald and Darren Bobroff of Ronald Bobroff & Partners Inc attorneys ("RBP")".
- 5.2 Further, Mrs Graham stated on Page 19 of her founding affidavit in the Application against RBP/LSNP, prepared by Van Niekerk, in Case No. 61790/2012, at paragraph 88.3 "Discovery had engaged George to represent such of its members as might wish to have their fee arrangements with RBP reassessed. The service would be provided at no cost to such members" i.e. Discovery would be funding Mr Van Niekerk's services." Mrs Graham also makes reference in her affidavit to interactions with Mr Katz and involving the Grahams. It is of course, Van Niekerk who has at all times been instructed by Katz who has been present with him in Court, in respect of every proceeding against us.
- 5.3 It seems clear that Mr Van Niekerk, having previously been accused by the Law Society in the Graham matter as having perjured himself, has done so again.
6. 6.1 Significantly, the Law Society itself has deposed in affidavits filed in the Graham application, that such application, and by implication all actions in the Grahams' name conducted by Mr Van Niekerk - who is invariably the deponent in all the substantive affidavits, rather than the Grahams, - were effectively done at the instance of, and for the benefit of Discovery, and not former RBP client, Mr Graham, as per the untrue media statements put out by Discovery's CEO Broomberg, Katz, Van Niekerk and Beamish. See Affidavit dated 04 April 2013 - paragraph 10.5 in the Graham matter under Case No. 61790/2012 -

"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



G1

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, (Ronald Bobroff)."

- 6.3 It is therefore clear that all the Court, Media and Law Society attacks/complaints against the writer, Darren Bobroff and RBP Inc, since 2011 to date, emanate from Katz, on behalf of Discovery, **DIRECTLY** via Katz's instructions to Van Niekerk; and **INDIRECTLY** via instructions given by Katz to Millar, invariably targeting RBP clients/ Discovery members, who were charged Law Society compliant common-law percentage fees by RBP.
- 6.4 Notwithstanding the above, and incontrovertible evidence to the contrary, Mr Van Niekerk continues to persist in the farce that, Mr Graham and his wife are his real clients in the normal course of events, notwithstanding that:
- 6.4.1 The Grahams do not make the substantive affidavits in all the court proceedings launched in their names,
- 6.4.2 Van Niekerk deposed to virtually every substantive affidavit in the multitude of proceedings instituted by himself, instructed and paid by Discovery, and masquerading as proceedings brought on the instructions and for the benefit of Mr Graham;
- 6.4.3 the Grahams have not attended numerous of the proceedings, at the Law Society allegedly brought at their instance for their benefit by Van Niekerk;
- 6.4.4 the Grahams do not attend the Court proceedings in respect of applications brought in their names and ostensibly for Mr Graham's benefit. In particular they were not present for the full three days of argument in the Pretoria High Court from 27 – 29 January 2014.
- 6.5 The collusion and common purpose between Discovery/Katz and Millar as a proxy for Katz, is graphically apparent from the fact that Katz with his entire compliment of staff, and Messrs. Berger and Millar, together with all their professional staff, were present for the full three days, at the Graham Court hearing in January 2014, **AND IN FACT AT EVERY SINGLE COURT HEARING** conceived, formulated and launched by Mr Van Niekerk, instructed and paid by Discovery; notwithstanding that they, (Berger and Millar), had no involvement whatsoever in those matters.
- 6.6 As was stated by Legal Official Jaco Fourie in September 2014 when speaking with the writer, despite the unprecedented media campaign waged by Discovery and its proxies against the writer in September 2014 and RBP Inc, commencing 2011 onwards, there had not been during the intervening four years **A SINGLE COMPLAINT AGAINST THE PRACTICE OF RBP, FROM ANY PERSON OTHER THAN THE FEW RBP CLIENTS WHO FELL INTO MILLAR'S HANDS, AND OF COURSE, BY VAN NIEKERK IN RESPECT OF MR GRAHAM AND HIS WIFE.**
- 6.7 Significantly that remains the position to date, despite Discovery harnessing yet others of its proxies, Mr Beamish, who surprisingly suddenly became employed by



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Carte Blanche in January 2015, and other individuals at carte blanche – every one of whom is beholden to discovery in one way or another - to launch a vicious, false and Discovery tailored attack on the writer and RBP Inc, this portrayed us – despite the writer furnishing all involved at Carte Blanche, with chapter and verse proof of the widespread and ethically proper use by vast numbers of attorneys of exactly the same agreements - as the only attorneys in the Country who had utilized common-law contingency fee agreements, and were therefore to be regarded as rogues for doing so.

7.

- 7.1 We point out that this is not the first occasion that Katz on behalf of Discovery has made threats. As will be noted in paragraph 10 of an affidavit attached hereto marked "A" and which was deposed to by RBP director, Mr Stephen Bezuidenhout, on 22 September 2014, and annexed to court papers involving the Discovery funded and instigated "Graham complaint", Katz uttered the threat, ***"Don't waste your time with appeals. We, (Discovery), are going to destroy you all"***.
- 7.2 At the hearing of an application in the De La Guerre and De Pontes matters, brought against our Practice by Mr Millar as part of his ongoing attacks on our Law Society compliant common-law fee agreements, we were represented by Advocate N Cassim SC. As is always the case with any proceedings against our Practice by Discovery's proxies Berger and Millar, Mr Jeffrey Katz was present in court, gloating, grimacing and doing his best to provoke our Practice staff.
- 7.3 At the conclusion of the hearing, Advocate Cassim SC engaged opposing counsel and attorney in an attempt to see if matters could be amicably resolved. Mr Katz, then present with Millar, informed Advocate Cassim SC "that we (referring to Discovery) will destroy the Bobroffs, no matter what it takes". Advocate Cassim reported this to the writer, and indicated that he will be available to testify accordingly.

8. Having regard to the fact that:

- 8.1 Millar was immediately aware, directly after the Council meeting of the 26 June 2015, of a resolution passed by the Council of the LSNP to conduct a further inspection of our Practice's books;
- 8.2 Millar immediately communicated that fact to Discovery's Katz, and Discovery's media pawn, Beamish, via tweets attached marked "B" and "C";
- 8.3 Katz enquires from Millar, in his tweet at on 26 June "whether it, (the Resolution), included comm", obviously referring to a proposed inspection/witch hunt, (also sought by Discovery in its so-called recent "Counter Application"), with





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regard to our use of LSNP compliant common-law fee agreements, and Millar responds "yes";

8.4 Certain elements within the LSNP Disciplinary Department, have since 2012, deliberately and astonishingly, ignored overwhelming evidence of strikable misconduct on the part of Messrs Berger and Millar, on the one hand, but on the other, respond swiftly and vigorously to all complaints by Discovery's Jeffrey Katz, its Attorney George Van Niekerk and proxy Mr Millar, against the writer, Mr Darren Bobroff and other members of the Practice.

8.5 Complaints by Millar/Katz/ Van Niekerk, no matter how frivolous and male fide – even such as to require the Law Society to take action against us, for doing precisely that which the Law Society, for more than ten years, permitted and encouraged its members to do, i.e. charge our clients contingency percentage fees complying with the norm of 25% or a few per cent more in accordance with Law Society guidelines – invariably has resulted in appearances before investigating committees and/or a disciplinary committee, usually on minimum ten days' notice.

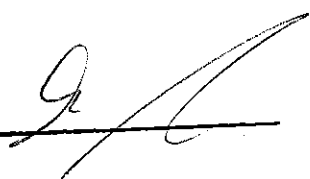
We are concerned that Katz's allegations in paragraphs 2e, 2h, 2j, 2l, 2m, 2n and 2o above, may well have substance.

9. We accordingly request the Law Society to urgently investigate Katz's threats and conduct, as referred to above, as also how Millar contemporaneously received information about the resolution passed at the Council meeting on the 26 June 2015, and as referred to above. We sincerely hope that these will be viewed in the serious light same merit, given the fundamental governance and corporate integrity issues raised regarding the functioning of the Law Society and its Disciplinary Department.

10.

10.1 Having regard to the content of the tweets, which are attached, and referred to above, and which were published by Millar to Katz and Beamish, within minutes of the Council meeting 26 June 2015 adjourning, it is clear that Mr Millar has a direct source of contemporaneous and confidential information about the content of Council meetings.

10.2 One can only hope that this will finally stir the Law Society into dealing swiftly and decisively with this ongoing and shocking breach of Council confidentiality and integrity by Mr Millar and whoever are/is his accomplice/s. A previous serious breach of the confidentiality of council business has already been perpetrated by Mr Millar, who came into unlawful possession of correspondence between the writer, the Director and member of a special Law Society Committee set up to deal with DJP Van Der Merwe's Contingency Fee Practice directives. This also needs to be properly investigated by Council now as there may well be a common factor involved.



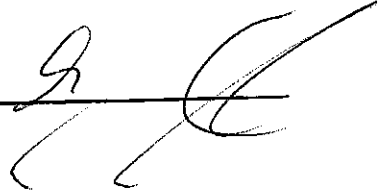
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11. The Council should utilize its power to summons Millar and Katz to appear before it or MANCO, sitting as an Investigating Committee, and to explain on oath, how Millar became aware, within minutes of the meeting being adjourned, of the 26 June 2015 resolution referred to, and which he refers to in his tweets attached. Also with regard to the letter to the Director referring to the above.
12. Mr Katz should also be summonsed to appear before such committee separately, so as to explain on oath the factual basis on which he made the threats to Darren Bobroff, and to elucidate those statements and threats which seem to clearly indicate a breach of the integrity of Law Society staff and/or processes. These are to be found in paragraphs 2h, 2j, 2l, 2m, 2n and 2o.
13. Further that we be permitted to attend and be represented at such investigative hearings, given that the information obtained by Millar was of a highly confidential nature and related to our Practice. It has always been Council policy that an inspection of an attorney's books is treated with extreme circumspection, confidentiality and sensitivity.
14. None of that is now possible, given the serious breach of confidentiality resulting from Millar being informed by Law Society sources, of the proposed inspection, and his publishing this to Katz and via Beamish, to the world at large.
15. Similarly if Katz's allegations in 2h, 2j, 2l, 2m, 2n and 2o are true, and events during the past few years strongly suggest this to be the case, the ramifications will surely be most far reaching in numerous respects.

Kindly acknowledge receipt hereof and keep us informed as to what action the Council proposes taking against Messrs Millar and Katz.

Yours Sincerely 

**RONALD BOBROFF & PARTNERS INC.**



ER

65  
FA-14

Sent from my iPhone

Begin forwarded message:

From: "Travel Document" <[itinerary@amadeus.com](mailto:itinerary@amadeus.com)>  
Date: 18 March 2016 at 10:07:53 AM SAST  
To: [BOBROFFRONALD@GMAIL.COM](mailto:BOBROFFRONALD@GMAIL.COM)  
Subject: BOBROFF/RONALD MR 19MAR2016 JNB PER

SOUTH AFRICAN AIRWAYS FLYSAA S AFRICA  
AIRWAYS PARK, JONES ROAD  
O.R. TAMBO INTERNATIONAL AIRPORT  
JOHANNESBURG  
SOUTH AFRICA  
TELEPHONE: 2711 978 1111  
FAX: TBA

BOOKING REF: 3D2TUN  
DATE: 18 MARCH 2016

BOBROFF/RONALD MR

FLIGHT SA 280 - SOUTH AFRICAN AIRWAYS

SAT 19 MARCH 2016

DEPARTURE: JOHANNESBURG, ZA (O.R. TAMBO INTL), TERMINAL B 19 MAR 21:00  
ARRIVAL: PERTH, WA (PERTH), TERMINAL 1 20 MAR 12:20  
FLIGHT BOOKING REF: SA/3D2TUN  
RESERVATION CONFIRMED, BUSINESS (D) DURATION: 09:20

BAGGAGE ALLOWANCE: 2PC  
MEAL: BREAKFAST/DINNER  
NON STOP JOHANNESBURG TO PERTH, WA  
OPERATED BY: SOUTH AFRICAN AIRWAYS, SA  
AIRCRAFT OWNER: SOUTH AFRICAN AIRWAYS, SA  
EQUIPMENT: AIRBUS INDUSTRIE A340-300

FLIGHT SA 7258 - SOUTH AFRICAN AIRWAYS

SUN 20 MARCH 2016

DEPARTURE: PERTH, WA (PERTH), TERMINAL 1 20 MAR 15:05  
ARRIVAL: SYDNEY, NS (KINGSFORD SMITH), TERMINAL 2 20 MAR 22:15  
FLIGHT BOOKING REF: SA/3D2TUN

*[Handwritten signature]*

RESERVATION CONFIRMED, BUSINESS (D)

DURATION

66

NON STOP BAGGAGE ALLOWANCE: 2PC  
MEAL: MEAL  
PERTH, WA TO SYDNEY, NS  
OPERATED BY: VIRGIN AUSTRALIA INTL, VA 562  
AIRCRAFT OWNER: VIRGIN AUSTRALIA INTL, VA  
EQUIPMENT: AIRBUS INDUSTRIE A330-200

FLIGHT SA 7257 - SOUTH AFRICAN AIRWAYS

TUE 22 MARCH 2016

DEPARTURE: SYDNEY, NS (KINGSFORD SMITH), TERMINAL 2

ARRIVAL: PERTH, WA (PERTH), TERMINAL 1

FLIGHT BOOKING REF: SA/3D2TUN

RESERVATION CONFIRMED, BUSINESS (D)

22 MAR 19:00

22 MAR 21:05

DURATION: 05:05

NON STOP BAGGAGE ALLOWANCE: 2PC  
MEAL: MEAL  
SYDNEY, NS TO PERTH, WA  
OPERATED BY: VIRGIN AUSTRALIA INTL, VA 569  
AIRCRAFT OWNER: VIRGIN AUSTRALIA INTL, VA  
EQUIPMENT: AIRBUS INDUSTRIE A330-200

FLIGHT SA 281 - SOUTH AFRICAN AIRWAYS

TUE 22 MARCH 2016

DEPARTURE: PERTH, WA (PERTH), TERMINAL 1

ARRIVAL: JOHANNESBURG, ZA (O.R. TAMBO INTL), TERMINAL A

FLIGHT BOOKING REF: SA/3D2TUN

RESERVATION CONFIRMED, BUSINESS (D)

22 MAR 23:45

23 MAR 04:30

DURATION: 10:45

NON STOP BAGGAGE ALLOWANCE: 2PC  
MEAL: BREAKFAST/DINNER  
PERTH, WA TO JOHANNESBURG  
OPERATED BY: SOUTH AFRICAN AIRWAYS, SA  
AIRCRAFT OWNER: SOUTH AFRICAN AIRWAYS, SA  
EQUIPMENT: AIRBUS INDUSTRIE A340-300

GENERAL INFORMATION

CHECK YOUR TRIP ONLINE

<https://www.checkmytrip.com/CMTServlet?R=3D2TUN&L=US&N=BOBROFF>

# Itinerary

Page 67

17A15

From: Sydney, NS Australia  
To: Perth, WA Australia  
Class: ECONOMY (B)  
Stops: Non-stop  
Status: Confirmed  
In flight service: Meal, Non-smoking

Airport: SYD - Kingsford Smith, Terminal 2  
Airport: PER - Perth Arpt, Terminal 1  
Baggage: ADULT 2PC  
Duration: 05:05  
Aircraft: Airbus Industrie A330-200

Vendor Locator: 3AL8TY

Service(s): Ticket Numbers (E-tickets) 0831692411037C3 - Confirmed  
BOBROFF/DARRENRODNEYMR: Vegetarian Vegan Meal - No action  
E-ticket(s): BOBROFF/DARRENRODNEYMR: 083 1692 411037

Tuesday, March 22

FLIGHT: Perth to Johannesburg (SA281)

Date: March 22, 2016 (Tue)  
Airline: South African Airways  
Flight: SA281 (Operated by South African Airways)  
From: Perth, WA Australia  
To: Johannesburg, South Africa  
Class: ECONOMY (B)  
Stops: Non-stop  
Status: Confirmed  
In flight service: Dinner, Breakfast, Movie, Audio Programming, Duty Free Sales, Non-smoking, Short

Departs: 23:45 hrs  
Arrives: 04:30 hrs (March 23)  
Airport: PER - Perth Arpt, Terminal 1  
Airport: JNB - O R Tambo International Arpt, Terminal A  
Baggage: ADULT 2PC  
Duration: 10:45  
Aircraft: Airbus Industrie A340-300

Feature Video

Vendor Locator: 3AL8TY

Service(s): Ticket Numbers (E-tickets) 0831692411037C4 - Confirmed  
BOBROFF/DARRENRODNEYMR: Vegetarian Vegan Meal - Confirmed  
E-ticket(s): BOBROFF/DARRENRODNEYMR: 083 1692 411037

## E-tickets

Airline	Ticket Number	Name	Issued	IATA Number
083	083 1692 411037	BOBROFF/DARRENRODNEYMR	16MAR	77210593
Coupon	USE Airline Flight Class Date Orig Dest Time Status Fare Basis			NVB NVA
1	ARPT SA 280 V 16MAR JNB PER 2100 OK VLSP1Y			16MAR 16MAR
2	ARPT SA 7258 V 17MAR PER SYD 1520 OK VLSP1Y			17MAR 17MAR
3	ARPT SA 7257 B 22MAR SYD PER 1900 OK BSE1Y			22MAR 22MAR
4	ARPT SA 281 B 22MAR PER JNB 2345 OK BSE1Y			22MAR 22MAR

\*\*\*BONVOYAGE\*\*\*

FA 16 68

Optus

21:57

30%



+27 82007228163983

Text Message  
Tue, 21 Mar, 03:49

Hawks are waiting to  
arrest wives at  
07.30pm at Cassims  
house.

*Handwritten signature*

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FAD

Gmail - Justice for RBP's client - the voluntary return of Messrs Bobroff to SA

23/10/2016, 10:40 AM



## Justice for RBP's client - the voluntary return of Messrs Bobroff to SA

Justice4RBPClients <justice4rbpcclients@gmail.com>

To: Ronald Bobroff <bobroff@icon.co.za>, Ronald Bobroff <bobroffronald@gmail.com>, Darren Bobroff <darrenbobroff@gmail.com>

Cc: Steven Bezuidenhout <steve.bez@mweb.co.za>, Mandy Bezuidenhout <mandy.bez@mweb.co.za>

Tue, Oct 18, 2016 at 8:17 PM  
Darren Bobroff

Dear Ronald, Darren

It is in everyone's interest that you return to South Africa such that justice can be served to all role players to Ronald Bobroff & Partners (RBP) past shenanigans.

Unfortunately 2 of the 3 directors of RBP fled South Africa to avoid arrest. This is delaying the justice process which as lawyers I am sure you can understand. We want to avoid any further delays to get justice for RBP's clients, as if your clients did not suffer enough from their injustices.

It is in your personal interest to return to South Africa without delay and we are prepared to give you grace till end November 2016 for both of you to return voluntarily. Should you decide not to return to South Africa and allow the SA legal system to run its course, there will be consequences for both you and your families.

These consequences could include:

1. God will be disappointed with you, and since you are religious men, this should be important to you and your families.
2. Your conscience will remain troubled well into your old age.
3. You will have further tarnished the reputation of the your profession. A profession that you proudly had represented at the various Law Societies.
4. Your family, children and grand-children will suffer from the consequences of their fathers' misdeeds. On this aspect, we really do not want to harm your sons in Australia, and daughters in South Africa. However, should you do not return to SA by end November, you will be leaving us little choice. Any potential harm that could result from your inaction, would be as a direct result of your own doing (and you will need to live with a further burdened conscience).

Please could you make the necessary arrangement to return to South Africa by no later than end November 2016. Should you wish to discuss the matter with us (or you would like to put forward your side of the story), please let us know your contact details by return email.

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FA18

Gmail - Justice for RBP's clients - voluntary return of Messrs Bobroff to SA

8/11/2016, 4:50 PM



## Justice for RBP's clients - voluntary return of Messrs Bobroff to SA

Justice4RBPClients <justice4rbpcipients@gmail.com>

Fri, Nov 4, 2016 at 12:34 AM

To: Ronald Bobroff <bobroffronald@gmail.com>, Ronald Bobroff <bobroff@icon.co.za>, Darren Bobroff <darrenbobroff@gmail.com>

Cc: Mandy Bezuidenhout <mandy.bez@mweb.co.za>, Steven Bezuidenhout <steve.bez@mweb.co.za>

Dear Ronald, Darren,

We note that you have not responded to our initial email of 18 October, and have not attempted to provide your side of the story.

The end of November deadline for your return to SA is approaching, and we really do not want to have to resort to getting your wives, children and grandchildren to suffer the consequences of their father's misdeeds. We understand that Elaine is back in SA in Victory Park ... , and we know where your family are staying in Sydney .... and we know where your kids go to school ....

Concerned citizens dismayed by the Bobroff shenanigans and their unethical exploitation of the weak over several years

Justice4RBPClients <justice4rbpcipients@gmail.com>

Tue, Nov 8, 2016 at 2:57 AM

To: Ronald Bobroff <bobroffronald@gmail.com>, Ronald Bobroff <bobroff@icon.co.za>, Darren Bobroff <darrenbobroff@gmail.com>

Cc: Steven Bezuidenhout <steve.bez@mweb.co.za>, mandy.bez9180@gmail.com, Tony Beamish <tony@carteblanche.co.za>

[Quoted text hidden]



71

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**Justice4RBPClients** <justice4rbpcipients@gmail.com>

to Ronald, Ronald, me, Mandy, Steven

Nov 21 (10  
days ago)

Dear Ronald, Darren,

We note that you have not responded to our emails of 18 October (or 3 November) to provide your side of the story. It would be in your interests to take our emails with the necessary seriousness if you care for, and love your families. The end of November deadline for your return to SA is approaching, and we do not want to have to resort to getting your wives, children and grandchildren to suffer the consequences of their father's misdeeds.

Concerned citizens dismayed by the Bobroff's shenanigans and their unethical exploitation of the weak

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## BDK ATTORNEYS

OUR REF: U.A. ROUX

YOUR REF:

23 March 2016

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### PRESS RELEASE – OUR CLIENTS: RONALD BOBROFF, DARREN BOBROFF, LISA BOBROFF

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1. We confirm that we represent the above individuals ("our clients") in any matters where the State has or intends to lay criminal charges.
2. We confirm that our clients are currently in Australia. Our clients deny from the outset that they have acted in any unlawful manner.
3. We confirm that our clients have not had to answer to any charges brought against them and that we have not been provided with or had sight of any warrants for their arrest which have allegedly been issued. In light of this, we cannot deny or confirm whether such warrants have been issued or not.
4. Our clients exited the country without being stopped and / or questioned by any South African immigration authorities and/or members of the South African Police Services, their exit thus being lawful and not in contravention of any alleged restrictions imposed on their freedom of movement.

#### ESTABLISHED 1960

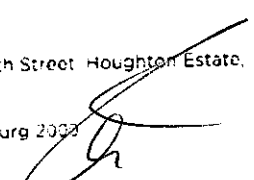
David H Botha, du Plessis & Kruger Inc - Reg No. 98/16549/21  
VAT No. 4040180012

**Directors:** Pieter Jacobus du Plessis BA LLB,  
Jan Christoffel Kruger BA LLB, Roelof Cilliers Krause BLR LLB,  
Ulrich Andre Roux B.Comm LLB  
**Consultant:** Ian Small-Smith BProc

**T.** + 27 11 838 1214  
**F.** + 27 11 836 8740 / + 27 86 603 3183  
**E.** [thefirm@bdk.co.za](mailto:thefirm@bdk.co.za)  
[www.bdk-attorneys.co.za](http://www.bdk-attorneys.co.za)

Ground Floor, Oxford Terrace, 3 on 9th Street Houghton Estate,  
Johannesburg

PO Box 5013, Docex 243, Johannesburg 2002



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5. Should our clients be requested by the South African Police Services and/or the National Prosecuting Authority to assist in any investigation into their conduct and/or that of the law firm Ronald Bobroff & Associates, our clients undertake to provide their full co-operation and will answer to any queries in as far as it is possible and to the best of their knowledge.
6. We confirm that our clients have not been charged with any crimes and that they have not broken any laws in travelling to Australia.
7. Our clients will not answer to any further queries from the media and all future queries are to be directed at us.

**ULRICH ROUX**

**DIRECTOR**

**BDK ATTORNEYS**

**DAVID H BOTHA, DU PLESSIS & KRUGER INC.**



74  
FAZ

**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: [johnncam@mweb.co.za](mailto:johnncam@mweb.co.za)**

---

Your Ref: Mr A Bloem  
Our Ref: J Cameron/att/Rooth & Wessels, Pretoria/Bobroff – LSNP striking off  
Date: 23 November 2016

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

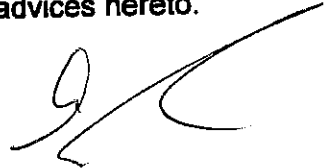
**OUR CLIENTS: RONALD AND DARREN BOBROFF ("THE BOBROFFS") AND**  
**RONALD BOBROFF AND PARTNERS INC. ("RBP")**  
**YOUR CLIENT: THE LAW SOCIETY OF THE NORTHERN PROVINCES ("LSNP")**  
**RE: APPLICATION BY YOUR CLIENT TO STRIKE OFF THE BOBROFFS AS**  
**ATTORNEYS – IN THE HIGH COURT OF SOUTH AFRICA, GAUTENG DIVISION,**  
**PRETORIA – CASE NO. 20066/16 ("THE APPLICATION")**

We refer to the Application and attach hereto our clients' notice of intention to oppose same.

Kindly confirm/deny that your offices never received a similar office from attorneys Taitz & Skikne (the writer having being advised by R Zimmerman that he had never served such a notice as he had never been instructed to do so as a consequence of you not having formally served on him your client's notice of motion and founding papers – apparently service was attempted by email and which form of service was never agreed upon between your offices and those of Taitz & Skikne).

You are requested to acknowledge receipt hereof and we await your advices hereto.

Yours faithfully  
J J F CAMERON



**IN THE HIGH COURT OF SOUTH AFRICA**  
**(GAUTENG DIVISION, PRETORIA)**

**CASE NO: 20066/2016**

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1-FA22

In the matter between:

**THE LAW SOCIETY OF THE NORTHERN PROVINCES**

Applicant

and

**RONALD BOBROFF**

First Respondent

**DARREN RODNEY BOBROFF**

Second Respondent

**STEPHEN DEREK BEZUIDENHOUT**

Third Respondent

**RONALD BOBROFF AND PARTNERS INC.**

Fourth Respondent

**JENNIFER GRAHAM**

Fifth Respondent

**MATTHEW GRAHAM**

Sixth Respondent

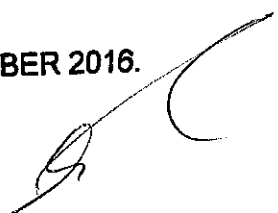
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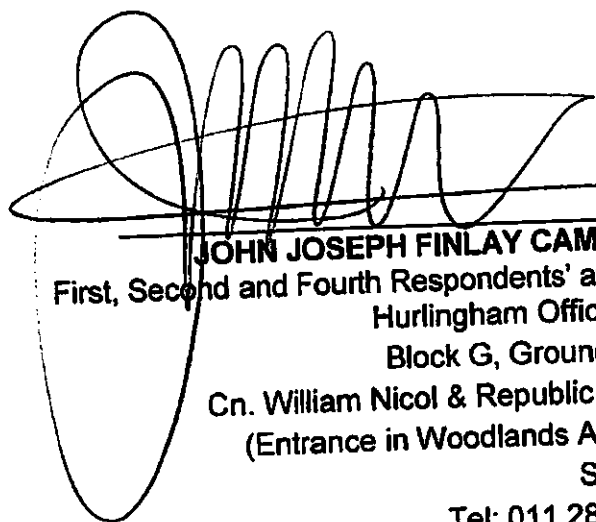
**NOTICE OF INTENTION TO OPPOSE**

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**KINDLY TAKE NOTICE** that the First, Second and Fourth Respondents hereby give notice of their intention to oppose the Applicant's application and will accept service of all notices and processes **via email**.

**DATED AT JOHANNESBURG ON THIS THE 23<sup>rd</sup> DAY OF NOVEMBER 2016.**





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**JOHN JOSEPH FINLAY CAMERON**

First, Second and Fourth Respondents' attorney  
Hurlingham Office Park  
Block G, Ground Floor  
Cn. William Nicol & Republic Roads  
(Entrance in Woodlands Avenue)

Sandton

Tel: 011 285 0043

Fax: 011 325 4780

Cellular: 072 041 8818

Email: [johncam@mweb.co.za](mailto:johncam@mweb.co.za)

Ref: J Cameron

**C/O FRIEDLAND HART SOLOMON NICOLSON**

Monument Office Park  
Block 4, Third Floor  
79 Steenbok Avenue

Pretoria

Tel: 012 424 0200

Fax: 012 424 0207

Ref: Trudie van Straaten

**TO:**

THE REGISTRAR OF THE  
ABOVE HONOURABLE COURT  
PRETORIA

**AND TO:**

**ROOTH & WESSELS INC.**

Applicant's attorneys  
Walker Creek Office Park  
2<sup>nd</sup> Floor, Walker Creek 2  
90 Florence Ribeiro Avenue  
Muckleneuk  
Pretoria

Tel: 086 545 0264

Email: [AndreB@rwafrica.com](mailto:AndreB@rwafrica.com)

Email: [simonw@rwafrica.com](mailto:simonw@rwafrica.com)

Ref: Mr A Bloem/sw

Service via email on this the 23<sup>rd</sup>  
day of November 2016



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**AND TO:**

**BRUGMANS INC.**

Third Respondent's attorneys

Tel: (011) 354-9000

Fax (086 508 0224

Email: [teejay@brugmans.co.za](mailto:teejay@brugmans.co.za)

Ref: Mr T J Fagri/Ms Silva/B.391

C/O SANET DE LANGE ATTORNEYS

1 Ox Street, Cnr Brooks & Ox Streets

Menlo Park

Pretoria

Tel: (012) 362-3970

Fax (012) 362 7110

Email: [sdlprok@mweb.co.za](mailto:sdlprok@mweb.co.za)

Ref: S de Lange/al/SA 5794

---

Service via email on this the 23<sup>rd</sup>  
day of November 2016

**AND TO:**

**EDWARD NATHAN SONNENBERGS**

Fifth and Sixth Respondents' attorney

Ref: G van Niekerk

C/O **WEAVIND & WEAVIND INC.**

Block E Glenfield Office Park

361 Oberon Avenue

Faerie Glen

Pretoria

Tel 012 346 3098

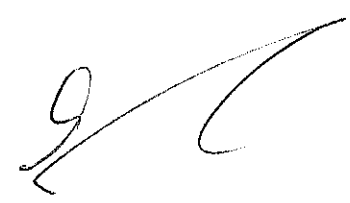
Email: [seanv@weavind.co.za](mailto:seanv@weavind.co.za)

Email: [gvanniekerk@ensafrica.com](mailto:gvanniekerk@ensafrica.com)

Ref: S V/D Merwe/E98057

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Service via email on this the 23<sup>rd</sup>  
day of November 2016



78  
FA 29

**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@mweb.co.za](mailto:johncam@mweb.co.za)**

---

Your Ref: Mr A Bloem  
Our Ref: J Cameron/att/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  
MUCKLENEUIK  
PRETORIA

P O Box 2265, Brooklyn Square, 0075

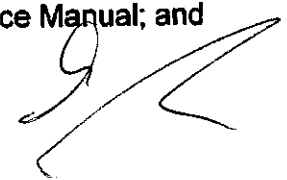
**TELEFAX NO: (012) 452 4000**  
**TELEPHONE NO: 086 545 0264**  
**EMAIL: [simonw@rwafrica.com](mailto:simonw@rwafrica.com)**

Dear Sirs

**OUR CLIENTS: RONALD AND DARREN BOBROFF ("THE BOBROFFS") AND**  
**RONALD BOBROFF AND PARTNERS INC. ("RBP")**  
**YOUR CLIENT: THE LAW SOCIETY OF THE NORTHERN PROVINCES ("LSNP")**  
**RE: APPLICATION BY YOUR CLIENT TO STRIKE OFF THE BOBROFFS 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:-

1. 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
- 



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 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 Skikne 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 advices hereto.

Yours faithfully

J J F CAMERON

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