



1st Respondent - **President Republic of South Africa**

2nd Respondent - **Minister of Cooperative Governance and Traditional Affairs**

3rd Respondent - **Minister of Health**

C/O State Attorney (L Kopman)

Office of the State Attorney: Pretoria

Salu Building , 136 Thabo Sehume Street,

Cnr Sehume and Franses , Beard Street

Pretoria , 0001

Tel: 012 3091682

Your Ref: 00063/21/Z16/MP

Email: LKopman@justice.gov.za

Ref No: **UNLOCK2021/25**

Date : 28 January 2021

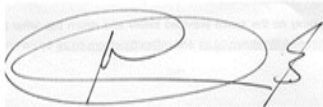
**RE: URGENT APPLICATION: HOLA BON RENAISSANCE
FOUNDATION// PRESIDENT OF S.A AND ANOTHERS, CASE
No:1357/2021**

Dear L K o p m a n

1. The above matter refers
2. This letter serves to refer to the letter dated 27 January 2021, issued by your office ;
3. We have received the answering affidavit of the first and second respondent including 12 (twelve) annexures
4. With the regard to the third respondent, we acknowledge the challenges mentioned to the applicant faced by department and we shall await the answering affidavit on the 29 January 2021 as requested by the third respondent

5. According to applicant's Notice of Motion, it clearly states the following: "That the non-compliance to the Uniform Court Rules and Practice Directives regarding the forms, time period be condoned and any other procedural referred to the Rule 6 of the Uniform Rules of the Court("The Rules") and that this application is being heard on a semi-urgent basis in terms of the provision of Rule 6(12) of the Rules".
6. On the issue of urgency, the applicant has not only justified reasons to be granted but had also provided merits required for this urgency to be granted without reservations by any court in the land .
7. In responding to the 1st, 2nd and 3rd respondent invitation that we agree for the matter to be removed from urgent roll and that a special allocation is sought from the Deputy Judge President. We hereby intend to agree on your proposal that of removing the matter from the roll now to a later date taking into account point 5, that shall be provided the respondent agrees and execute the following conditions :
 - a) That the first and second respondent suspend and/or put a moratorium on the Disaster Management Regulations
 - b) That the first and second respondent suspend /or put a moratorium on the lockdown
 - c) That the first, second, third and fourth respondents suspend and/or put a moratorium on the buying and/or purchasing and/or procuring of Covid19 Vaccine
 - d) That the respondents suspend and/or put a moratorium on reporting on Covid19

- e) That the first, second, third and fourth respondents suspend and/or put a moratorium on the deployments and/or implementation and/or vaccination of Covid19 vaccine.
- e) That all the above point (a) and (b) and (c) and (d) and (e) are subjected to the outcome of the final court proceedings up to judgment and/or a court order is granted on this matter.
8. The respondent are given up to 31 January 2021, at 12pm midnight to consider our proposal and respond accordingly.
9. In the event that the respondent decides to wave and/or reject our conditions, the applicant shall be left with no other alternative but execute our Notice in terms of Rule 41A of the Uniform Rules, furthermore to proceed to court and pray for the sought relief.
10. This letter is written with prejudice and will be place before the court should a need arise



Yours faithfully

Boutshitswe P Mothopeng Msieleng

Representative of Hola Bon Renaissance (HBR) Foundation

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COPY: Received Copy hereof on
this the _____ day of _____ 20__