

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

CASE NO: 1357 /2021

IN THE MATTER BETWEEN:

HOLA BON RENAISSANCE FOUNDATION **1ST APPLICANT**

AND

PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA **1ST RESPONDENT**

**MINISTER COOPERATIVE GOVERNANCE AND
TRADITIONAL AFFAIRS** **2ND RESPONDENT**

MINISTER OF HEALTH **3RD RESPONDENT**

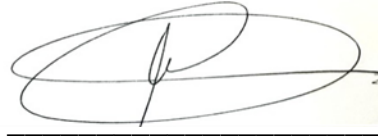
MINISTER OF FINANCE **4^H RESPONDENT**

SOUTH AFRICAN MEDICAL RESEARCH COUNCIL **5TH RESPONDENT**

FILLING

Document: Applicant Practice Notes

DATED at Johannesburg on this the __1__ day of February 2021



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REF NO:UNLOCK2021/25

TO: THE RESIGTAR OF THE
ABOVE HONORABLE COURT
PRETORIA

TO: 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)

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And TO: **5th Respondent - South Africa Medical Research Council**

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MINISTER OF FINANCE 4^H RESPONDENT

SOUTH AFRICAN MEDICAL RESEARCH COUNCIL 5TH RESPONDENT

REPLYING AFFIDAVIT

I, the undersigned,

Boutshitswe Preddy Mothopeng Msieleng

DECLARE UNDER OATH AS FOLLOWS:

1. I am a major male, South African citizen and registered to vote during any election. I am the 1st Applicant herein, a representative, a member and the chairperson of HOLA BON RENAISSANCE FOUNDATION (HBRF), the Applicant business address 88 Marshall Street, 2nd floor, Marshalltown, Johannesburg which is also the domicilium citandi et executandi for the Applicants.
2. Where I attach any annexure hereto, I humbly request that the Court reads its content with this reply affidavit as if specifically incorporated herein.
3. For the sake of brevity, I have not fully elaborated on all issues raised herein. Additional argument will be presented to the Court on these issues at the hearing of this application.
4. The facts contained in this affidavit are, to the best of my knowledge and belief, both true and correct.
5. I have read the Answering Affidavit of the third respondent deposed to by SABELO SIYABONGA SANDILE BUTHELEZI and would like to reply to it as follows.
6. To the extent that I fail to deal with any specific allegation or where such allegation is at variance with the content hereof and with the content of the

Founding Affidavit and its annexure, such allegation is to be deemed denied.

7. HBRF submit that most of the answers provided by the respondent are not addressing the matters raised in the applicant's affidavit but however seeks to maintain its position of refusing to account to the nation and to the courts by not answering.
8. It is in the interest of justice that HBRF continues to approached the court seeking the court intervention because of continuous infringement to the bill of rights
9. In the interest of the public that HBRF continues to approached the court seeking the court intervention because of continuous irresponsible and poor decision making resulting in loss of lives.
10. Continuous misleading the public and the nation for selfish interest
11. COVID19 pandemic is isolated and treated special in the exclusion of existing pandemics which are a more threat and deadly than COVID19
12. That there is no threat and cause to harm by COVID19 and therefore no need for vaccines
13. Furthermore HBRF submit that most of the answers provided by the respondent are matters to be argued and therefore only few paragraphs thereof justify a reply.

AD SERIATIM RESPONSE

- 14.** I turn to deal with the as Seriatim response to the founding affidavit, to the extent necessary. I do not intend to repeat matter that I have already covered and pray that what is set out above be regarded as incorporated into my response.
- 15.** I note that the concerns raised in the answering affidavit that HBRF affidavit is of extra ordinary length and it is so because the fundamental of human rights have been violated, the nation has been deceived of a common health related matter to be disguised as a disaster, with no substantive evidence, due to failure of the third respondent to adhere to time frames as per the applicant notice of motion, has resulted in not responding to all of them.
- 16.** My failure to respond to any particular paragraph or parts thereof should not be construed as an admission thereof. To the extent that any allegation is contrary to what I have set out in the preceding paragraphs, these are denied.
- 17.** I note that the third respondent also repeats some of the statement mentioned and when that happens I do not respond to the repetitions
- 18.** I note that the third respondent also repeats some of the statement mentioned by the first respondent and when that happens I do not respond to the repetitions

- 19.** I furthermore note that the third respondent often contradict the first and second respondent

AD PARAGRAPH 1 to 3

- 20.** I deny the content of the paragraph .I submit that the urgency be grated

AD PARAGRAPH 11.1 –

- 21.** We agree with the third respondent that the government intending rolling out of Covid19 of vaccine is impermissible and should be prevented

AD PARAGRAPH 11.2-3

- 22.** I deny the content of the paragraph. The first and second respondent have already address the issue on their answering affidavit considering the background of the application

- 23.** Nevertheless we cannot prevent a report from the 1st respondent on the discussion that is taking place at the global stage however when the 1st respondent declared and informed the nation of his intention to procure vaccine which was only in his December Statement , that is when acted to prevent such unlawful act

AD PARAGRAPH 11.4

- 24.** I deny the content of the paragraph. I dent content of this paragraph, with the Minister of health understanding that procedure of any vaccine to have undergone any testing prior to be procured and or a guarantee is issued, to ensure that the lives of South Africans are protected has been undermined and abridged, furthermore to guarantee to procure from COVAX , an entity or body “COVAX” that has just been launched in April 2020 clearly is an act of mismanagement, unreasonable conduct

and a violation of our Constitution, a violation of our health standard and negligence which may causes live to ordinary South Africans .

25. The applicant has tried to include the matter of vaccine initially its court application which was in Johannesburg **as per the first and second respondent answering affidavit in background**, however the state refused for the notice of motion to be amended as per annexure

AD PARAGRAPH 13:

26. I deny the content of the paragraph. Due to the urgency and the harm that has been caused by the respondents, and the chain of unlawful activities from march 2020 to date which resulted in the application bring applicant, most of the issues raised the respondent had adequate time to address because the applicant has been seeking a court hearing , and there we object that the respondent had little time or short time, of which is a clear indication that this application bought under urgency for interrelated unlawful actions by the Respondent, and furthermore we have outlined in the Affidavit the reasons of the urgency
27. The irreparable harm cause by the respondent is been outlined our affidavit and furthermore in the reports which have been attached as Annexure 15, 16, 20,21,22,23,24, 43, 44, 47, 48, 49,51, 52,55, 56, 59, 63,65,66,67,71,72,73, 81,91,92,93,96,97, and 101 just to list a few

NATURE OF COVID19

28. I deny the content of the paragraph. The global spread of COVID19 was declared a pandemic by WHO on 11 March 2020, this is after WHO was pressurized by the Bill Gates foundation the main Sponsor of WHO to declare it COVID19.

AD PARAGRAPH 15:

- 29.** I deny the content of the paragraph. the visuals that were circulating in the media was that of people falling and dying on the street, of which it has never been the condition in South Africa

AD PARAGRAPH 16:

- 30.** I deny the content of the paragraph. The applicant concurs and agrees that the reason we declare that COVID19 is not a pandemic is for the reason that the responded has for decades planned for such an eventuality. While Covid19 has have respiratory impact on human lungs (as does influenza) the former impacts on cells and the Human body far more extensively than influenza.

- 31.** However we differ that while Tuberculoses is by far deadly and highly extensively than Covid19 and Influenza , the respondent have chosen to ignore what is kills South Africans but chosen to focus country resources on what is killing Europe and America

AD PARAGRAPH 17,

- 32.** Indeed we agree there is No cure , because a cure is not needed in South Africa, because 99.97% of 1443939 (1 million four hundred and forty four thousand , nine hundred and thirty nine) of Total cases as on 20 January 2021, have self healed taking into account that since lock down in March 2020 to date in country without with any medical treatment required .
- 33.** This excludes that 0.03% reported death standing at 43633 (forty three thousand six hundred and thirty three) which there is no post mortem clearly outlining the cause of death to be covid19, furthermore include

noting that most pertinent have also died due to malnutrition and negligence by the third respondent see the annexure 56

AD PARAGRAPH 18:

34. I deny the content of the paragraph. The Symptoms of Covid 19 has exactly similarities in terms of symptoms with Flu, cold and TB and yet the respondent subject everyone to Covid19 and cover everyone with same testing or profiling, while for years South Africans have been experiencing varies Corona Virus and to isolate Covid19 has been an intentional disaster of actions by the third respondent.
35. May court be granted information by the **5th Respondent**, with data of any health related sickness that has the same symptoms as announced by the President and as per third responded definition and testing methods of which it publish it its website, of which that supports our Point18 and furthermore exceed.

AD PARAGRAPH 19:

36. I fully agree with the third respondent on this point , ***“Diabetes, hypertension, obesity and heart disease increase the chances of serious complications. Other co-morbidities identified include conditions which negatively affect immunity (such as cancer, tuberculosis and HIV/AIDS) and conditions affecting the respiratory tract (such as tuberculosis, asthma, lung disease)”***.
The important Question the court should ask is why punish everyone, if the respondents knows who are vulnerable .
37. **The 5th respondent** should be able to provide the data now how many South Africans qualify to be victims as per point 19. As per their own research to confirm to court of what is the impact of Covid19 and any death related to Covid19 as per their reports.

TRANSMISSION OF COVID19

AD PARAGRAPH 20.1-3

- 38. I concur with the third respondent on this paragraph
- 39. Even though the respondent does not indicate similarity of illnesses that share the same COVID19 symptoms such as TB ,

AD PARAGRAPH 20.4

- 40. I deny the content of the paragraph. the respondent state that “***at the moment , airborne transmission is thought to be one of the was that this virus spread***” this is an indication that South African have been marginalized, censored, abused and unfairly treated to wear mask, on what the third respondent thought, and not what the respondent research and proven to be a fact.
- 41. South Africans constitutional rights have been taken away and have been forced to wear a mask because of international trend and the decision is based on no evidence of fact and no proper research, yet the regulations has also imprisoned South Africans and taxed South Africans in terms of a fine for not wearing a Mask. This is sad and basically unconstitutional and limits the rights of South Africans.

AD PARAGRAPH 20.5

- 42. Like most Corona virus we agree with the Respondent

PRIMARY PREVENTION

AD PARAGRAPH 21.

- 43. I agree with in the third Respondent

AD PARAGRAPH 22.

44. I agree with the third respondent, however so as many Sicknesses such as flu, TB, cold, Cholera, Malaria etc...
45. **The 5th respondent should** provide their reports to the court on the number of sickness and/or illnesses that operates in this format as outlined by the third respondent which is "*However, if someone does not know that they themselves are infected with Covid-19 they and others will be unaware of the risk of infection posed by them. Once someone suspects or knows that they are infected with the virus, it may nevertheless be practically difficult or even impossible effectively to limit contact with surfaces and other people, especially if the infected person requires medical care*" this is to indicate that it is not only Covid19 diseases that we have been expose to and that we must be afraid of to the extent that the respondent bring the country to lockdown.

AD PARAGRAPH 23 –

46. I deny that point on reasons of why other deadly diseases identified in the country have not be treated and given the same conditional material of isolation of everyone and assuming that everyone has it like TB, malaria.
47. **The 5th respondent** as subject matter expect to provide data of diseased that qualifies to be treated in the outline point 23, this will indicate to the court that the decision for the third respondent has been unlawful, selective and ill advised as per the reports of the 5th Respondent

GOVERNMENT RESPONSE TO COVID19

AD PARAGRAPH 24.

- 48.** I deny the content of the paragraph. the statement to be based on untruth, ill informed baseless assumption, however the risk the applicant agrees with is defined in AD

PARAGRAPH 19

- 49.** I deny the content of the paragraph.

AD PARAGRAPH 25.

- 50.** I agree, however with the 1st respondent having to announce different levels of the lockdown which also reduced the number of people to be at workplace, that action has denied South Africans the right to health facilities, meaning the staff call centers, Emergency Medical services of the department of health have been reduced due to regulations and the 58 million South Africans have all bottleneck to try and get the health care service on a fewer personnel, resulting in death due to no access to health Services

AD PARAGRAPH 26,

- 51.** I agree with this point

AD PARAGRAPH 27,

- 52.** I agree with the Act and its intention and not with the conduct of the third respondent

AD PARAGRAPH 28.

- 53.** I deny the content of the paragraph. What was the research from the department with regards to the COvid19, in particular may the third respondent provide meeting minutes with officials of health in China, and this will indicate that the respondent decision has brought more

hard to all South Africans than any good in it. We also note that these cases mentioned in this point were tested using the thermometer which is also not a viable and reliable testing method.

AD PARAGRAPH 29.

54. I deny the content of the paragraph. The third respondent know that South Africa was approaching the winter seasons and knowing from past data that due to the fact that Flu, Cold and Covid19 share the same symptoms, it was easier to take all sicknesses including those who were infected with TB, and HIV/Aids in to the records to advance its self gain interest ,

55. **The 5th respondent** provide the court , with data from 2017-2020 of reports, where a number of people who got sick due to flu, cold, TB, HIV/Aids and any other diseases during those periods per month, this will indicate the level of which the COVID19 was blown out of perspective .

AD PARAGRAPH 30.

56. I deny the content of the paragraph.

AD PARAGRAPH 31.

57. I deny the content of the paragraph.

AD PARAGRAPH 32.

58. I deny the content of the paragraph. the applicant deny, there as not expanded health care capacity, even to this day, meaning all student nurses were stopped from assisting at health facilities, children were refused vaccination of missiles and other related, which led to death

while the health system focus on Covid 19, all other diseases and illness were undermined and that led to death .

59. While on the issues of ventilators we have attached Dr Tabane study in **Applicant founding Affidavit annexure 81** and broadcast on link reference 6 which clearly indicates how he treated patients with Covid19 complications,
60. On protective equipment the respondent s was only focus on looting funds from the State, focus on self enrichment.
61. On testing , a wrong testing model was used, every person who was sick was declared covid19 and that was wrong , instead the respondent were focusing on a casedemic,
62. The **5th Respondent** should provide if whether the testing and screening of Covid19 was effective and did it or not hamper with false reporting of Covid19 Statistics and should provide best practice of testing for flu, cold, TB, covid19 and any other related diseases

AD PARAGRAPH 33.

63. I deny the content of the paragraph. – the measures taken were not to address Covid19 but to violate the constitution and bill of rights

AD PARAGRAPH 34

64. I agree without any reservations, however if the first to fourth respondent had applied and studied the Malawi court judgment see attached “ **Applicant founding Affidavit Annexure 59**” and with the 1st respondent being the head of African Union, he should have studied the reasons and report of his fellow President of Tanzania and the reasons why Tanzania (**Applicant founding Affidavit Link reference no 32**) had to chase out World health organization (WHO) and

subsequently the applicant letter to WHO See the **(attached Applicant founding Affidavit Annexure 66)** would have resulted in a different outcome from the first to fourth respondents

AD PARAGRAPH 35 THEREOF:-

AD PARAGRAPH 35.

- 65.** I deny the content of the paragraph., the first respondent was clear that this lockdown would last for a long time and that the respondent had no plans to face it our as per our attached reference link No: 1 , hence we currently back on level 3.

AD PARAGRAPH 36.

- 66.** I deny the content of the paragraph., the respondent are delaying to face out the lock down because they are entrenched in self enrichment and are enjoying the violation of the bill of rights.

- 67.** The respondent has not provided any risk adjustment levels which is inclusive of the diseases and because they are still earning their salaries in full and with benefits and can furthermore violate the Public Finance Management Act, in Sourcing Services and goods including Vaccines

AD PARAGRAPH 37.

- 68.** I note the content of this paragraph

AD PARAGRAPH 37.1

- 69.** I deny the content of the paragraph., the third respondent has not proven and given scientific evidence that South Africa has entered as second wave, and what define what is referred to a second wave, the problem with respondent is that he want to please the world at the expense of South Africa, meaning South Africa has four season, which

is winter, summer, spring and autumn, while the United States, Asia and Europe has two seasons which are winter and Summer and therefore it make practical sense why they would enter the second wave of Covid19 is because they just came out of summer and they are entering the winter season ,while we know that in winter flu like diseases strives . in South Africa we are having our own material and environment condition of which has nothing to do with the rest of the world.

AD PARAGRAPH 37.2

- 70.** I deny the content of the paragraph, we have raised concerns of United Kingdom “ foreign institute” **see applicant founding Affidavit annexure 51**, which were practicing during lockdown , they were busy injecting South Africans with a new variance of Covid19 titled (CHAD0X1 NCOV-19 _ZA_PHI) and they were paying the poor R350 to inject them, of which it took place in Baragwaneth Nurses home, while we note that recently remarks that UK bans South Africa **see applicant founding Affidavit Annexure 77.**
- 71.** Furthermore that remarks of World Health Organization from the onset they targeted Africa and South Africa in particularly to be the testing ground for Vaccine , irrespective that the Director general of WHO earlier denied, we have a testimony where WHO is now reporting on how they are growing COVID19 new variance see **Applicant founding Affidavit Reference link No: 19.**
- 72.** The first to fourth respondents have connived with Bill Gates and World Health Organization to using South Africa as a case study, as a testing ground, so to promoting Vaccines which will be tested in millions of South Africans because we don't have rights and constitution which protect our interest, it is this court to stop such practice, hence our application.

AD PARAGRAPH 38

- 73.** I deny the content of the paragraph, as per our previous remarks that the testing of the diseases underwritten as if they are part of Covid19, when it comes to death due covid19, since march 2020 the first to fourth respondent they have been announcing that people have died due to COVID19, where have they been receiving their data because it is only on the 5th August 2020 **see applicant founding Affidavit Annexure 75**, when the third respondent had no access to post mortem prior to the date it was gazatted.
- 74.** The first to fourth respondent deceived and lied to South Africans provided COVID19 reports which had no substantial data and sustained lockdown for selfish interested , accusing innocent death to be COVID19, and denying members of the family their constitution right to bury their loved ones with pride and traditions, furthermore denying family and friends to pay their last respect because of lies and untruth shared resulted in the unconstitutional declaration of National Disaster Management Act regulations

AD PARAGRAPH 39.1-2

- 75.** Indeed we agree there is No cure , because a cure is not needed in South Africa, because 99.97% of 1443939 (1 million four hundred and forty four thousand , nine hundred and thirty nine) of Total cases as on 20 January 2021, have self healed taking into account that since lock down in March 2020 to date in country without with any medical treatment required .
- 76.** This excludes that 0.03% reported death standing at 43633 (forty three thousand six hundred and thirty three) which there is no post mortem clearly outlining the cause of death to be covid19, furthermore include

noting that most pertinent have also died due to malnutrition and negligence by the third respondent see the **applicant founding Affidavit annexure 56**

AD PARAGRAPH **40.**

77. I deny the content of the paragraph., COVID-19 poses or present no Threat to the lives and livelihoods of South Africa, but unpunished and continuous actions of this executive and Administration has brought more harm to South Africans.
78. There is no need for a vaccine for the majority of South Africans about 99.7% of reported cases because they have healed without any medical treatment though self isolation.
79. It is noted with people having different underlying health condition it is impossible to have a one size fit all medicine, every medicine should address the route cause rather than treating COVID19 which is regarded as a catalyst. Nevertheless that serious COVID19 cases has been treated successfully by Dr Tabane.

THE ROLE OF VACCINES

AD PARAGRAPH 41

80. I deny the content of the paragraph., We have been observing international trends where people die due to Covid19 Vaccine, it is has been impossible that in less than 12 month a vaccine has been researched, analyzed, Developed and tested , verified , and packaged ready for distribution ,
81. On this issues we request the expertise of the **5th respondent to** provide based on their report, research and experience if is possible

that a vaccine can be than 12 month a vaccine has been researched, analyzed, Developed and tested , verified , and packaged ready for distribution, and the 5th respondent must provide history and future analytical data, of which we believe they will come to the same outcome

AD PARAGRAPH 42

- 82.** I deny that there is no curve of infection to flatten, in terms of the immunity the scientist is South African have raised the issue of immunity and suggested that South Africans are immune to COVID19, and this members are members of the 5th respondent , see **applicant founding Affidavit annexure 71, 72 and 73.**
- 83.** This behavior of the respondent has to be put to stop where he continues violates the constitution's and the human rights using COVID19 as a disaster when it is the respondent who are a disaster to South Africans , in pursue of a selfish agenda.
- 84.** The first to the fourth respondent by procuring vaccine from COVAX has violated the constitution and the Disaster Management Act, chapter 6 (1)(2)(3) and (4) "Funding of Post Disaster recovery and Rehabilitation" **applicant founding Affidavit annexure 101** , it is noted that even the State owned enterprises are now accounting to a body that is not even part of the legislative arm , this is the corruption South Africans are experiencing every day since March 2020.
- 85.** The respondent has bad motives for a nation that self heal from COVID19, instead of focusing on the main

AD PARAGRAPH 43.

- 86.** I note the information and still deny, the concept if understanding a vaccine, diseases which has availed itself and that scientist would start from research of possible cause of the diseases, then researching,

analytics, testing, developing and sampling prior to the rollout. The respondent has not provided any evidence which bases their decision to procure any vaccine and there is not proof that the vaccine is safe for human consumption and its has not been tested, it has not even underwent the South African legal framework, authorities, regulators and standards.

- 87.** **The 5th respondent** should highly to the court on the concept of vaccine and how it come to being, what are the process involved and who and what should be in place before any vaccine should be used and/or deployed , we are of the view that our argument will result to the same outcome of the fifth respondent

AD PARAGRAPH 44.

- 88.** I deny the content of the paragraph, only well researched, tested , verified , trusted and approved by the country specialist scientists , regulators and recognized bodies mandated to govern such medical treatment, the first respondent cannot just order 20 million doses without any vaccine underwent due legal process aimed to save guard the lives of south Africans, that is abuse of power and abuse of office as it seeks to undermine all South Africans with the constitutional bodies empowered to address the vaccine issues.

AD PARAGRAPH 45.1-3

- 89.** I deny the content of the paragraph, with the death causality being unproved by the respondent , and that the question we should ask is what is the real interest for the first respondent and third respondent to have so much interest in vaccine and to force a nation which is immune to COVID19 to be vaccinated, what is the agenda , who is driving the agenda, is it because of the relationship between Bill gates who is the man donor of WHO which established COVAX and the President of the

Republic of South Africa (the first respondent) who has procured 20 million doses from COVAX ,

- 90.** This is a state capture by an international tycoon Mr Bill Gates and using WHO to enforce . it is even worse that the Tycoon know in 2015 about COVID19, furthermore hem know in February 2020 that South Africa will be hit hard by COVID19 even before we had a singer case of COVID19. The first respondent is corruption and as per his statement on a virtual parliament **See Reference link No 8** where he indicated that he is not driven by facts and sound research but selfish interest .
- 91.** Madagascar “African” has provided herbs to South Africa for use to assist to address to eradicate COVID19 which is far less monetary and side effect are far less due to the use of natural treatment , the respondent, African problems deserves African solutions

AD PARAGRAPH 47.

- 92.** I deny the content of the paragraph, the first respondent and the third respondent has confirm that he has ordered the vaccine of which and that they are to be delivered, clear indication that validations and processes undertaken to test any vaccine has been compromising SAHPRA and any other institution that must validate such vaccine.
- 93.** The third respondent confirms that SAHPRA will be part of the rollout, clearly indicating that SAHPRA has been compromised and captured , an institution which was supposed to be verifying , testing and validating the effect of the vaccine its mandate has been devoted to the rollout of vaccines, while for other medicine and/or ,medical treatment and/or vaccine SAHPRA is given enough time and due processes to conduct its feasibility study on any vaccine other than COVID19 vaccine.

94. The WHO guidelines have been at the detrimental of South Africans , when more lives could have been saved but because WHO banned a treatment which DR taban conducted to save lives we experience 40 000 death ,
95. Secondly the WHO guidelines on any death is misleading **See applicant founding affidavit Annexure 42** and therefore South African can never trust WHO interest it is because When Cuba doctors were in the South Africa there was a decline in COVID19 cases and as soon a top level delegation from WHO arrived they were new Strains of COvid19, there were an increase in COVID19 Cases and indeed WHO confirmed of that they were growing COVID19 in South Africa **See reference link no: 19**
96. It is for the reasons why the applicant is asking as one of the prayers, for the withdraw of work permit and/or visa of WHO staff and personnel
- AD PARAGRAPH 48.1-5
97. I deny the content of the paragraph. firstly that If the Hospital in South African were able to practice the Dr Tabane treatment more lives could have been saved,
98. Secondly every death has a underline heath condition and that they differ for a person to person and therefore there is no one vaccine that can be safe for all people .
99. Thirdly a vaccine that has not been perfected and tested is more dangerous and harmful to the people; the vaccine has not even been tested on pigs unless the people of South Africa are declared to be pigs

as per there earlier statement issued by the **Scientist see applicant Affidavit Annexure 52.**

- 100.** An effective vaccine should have been tested adequately over a set of period of time, indeed many South Africans will continue to die because there are denied access to health due to the first respondent statement that only during lockdown that there shall be no work place which will be at full capacity which include the health system forgetting that even under normal circumstance the hospitals are under resources and are failing to handle the 58 million South Africans who need assistance to health services. Now with 50% or less of work force at work please is the main cause of death.
- 101.** The decision of the first to fourth respondent is the reasons why people are dying due COVID19.

THE UNSUSTAINABILITY OF THE RELIEF SOUGHT

AD PARAGRAPH 49-

- 102.** I consent with the content of the paragraph

AD PARAGRAPH 50,

- 103.** ***I deny prayer 6 to 13 has not been dealt with***

- 104.** AD PARAGRAPH 51

- 105.** ***I agree that is our prayer***

- 106.** AD PARAGRAPH 52-54, ***I deny***

- 107.** I deny the content of the paragraph. When Africa was attacked by ibola, malaria HIV/Aids pandemic 's the world was never in solidarity with Africa meaning applying our measures and systems that Africa had

to undergo to save lives , when thousands of people died , today we have a diseases that is not deadly in Africa but it is mild in its nature however it seems to be deadly throughout the world that does not mean South Africa should apply the world solution, it has proven in the past that they always don't work unless tailored to our circumstance, while Africa is spared from Covid19 taking into account the environmental condition, the high immune developed over hardship and past experience which had made Africa to be prepared for such an outbreak .

- 108.** The idea that first, second third and fourth respondents should be stopped from reckless decision that are causing disaster which is taking lives of South Africa, it is only attainable through a court order .

REVIEW

AD PARAGRAPH 55-57

- 109.** I deny the content of the paragraph. the first to fourth respondent have violated DMA CHAPTER 6, Section 4 .
- a. All the respondents have violated chapter 6, section 4(1), by not subscribing to the Public Finance Management Authority and by procuring vaccine from COVAX without following PFMA.

AD PARAGRAPH 59 -64

- 110.** I deny the content of the paragraph. When the country does not need the health advise of WHO, they will be should be released with immediate effect without any delays to leave the country and therefore it is upon the third respondent who invited WHO and welcomed them to inform them of the court order and decision of the country. We believe the first and third respondent knows how protocol operate and shall comply will all the necessary arrangement of releasing the WHO team in the country without having to make any .

DATED AT PRETORIA ON THIS 1 DAY OF February 2021.



BOUTSHITSWE PREDDY MOTHOPENG MSIELENG

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REF NO:UNLOCK2021/25

I CERTIFY that this Affidavit was SIGNED and SWORN to before me at _____ on this the ____ of _____ 2021, after the Representative declared that he is familiar with the contents of this affidavit, and regards the prescribed oath as binding on his/her conscience and has no objection against taking the said prescribed oath. There has been compliance with the requirements of the Regulations contained in Government Gazette R1258 dated 21 July 1972 (as amended)

COMMISSIONER OF OATHS

FULL NAMES:

BUSINESS ADDRESS:

CAPACITY: