IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA (HELD IN BRAAMFONTEIN)

CASE NO:

HOLA BON RENAISSANCE FOUNDATION NPO

Applicant

and

PRESIDENT OF SOUTH AFRICA-CYRIL RAMAPHOSA

First Respondent

THE MINISTER OF COOPERATIVE
GOVERNANCE AND
TRADITIONAL AFFAIRS (COGTA)DR NKOSAZANA DLAMINI ZUMA

Second Respondent

MINISTER OF HEALTH- SOUTH AFRICA

Third Respondent

SOUTH AFRICAN NATIONAL
DISASTER MANAGEMENT CENTRE.

Fourth Respondent

SOUTH AFRICAN HEALTH PRODUCT REGULATORY AUTHORITY

Fifth Respondent

BPMM

Page 1 of 6

INDEX

No Pages Per Item Notice of Motion Dated 14 December 2021 Founding Affidavit of Boutshitswe Preddy Mothopeng Msieleng, dated 14 December 2021 HBR1a- Applicant's Resolution to initiate legal proceedings HBR 1b- HBR Constitution HBR 2- Great Barrington Declaration HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer JOHN 2- PCR-test Expert Statement: Prof. U. Kämmerer	
Notice of Motion Dated 14 December 2021 Founding Affidavit of Boutshitswe Preddy Mothopeng Msieleng, dated 14 December 2021 HBR1a- Applicant's Resolution to initiate legal proceedings HBR 1b- HBR Constitution HBR 2- Great Barrington Declaration HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	Page
Notice of Motion Dated 14 December 2021 Founding Affidavit of Boutshitswe Preddy Mothopeng Msieleng, dated 14 December 2021 HBR1a- Applicant's Resolution to initiate legal proceedings HBR 1b- HBR Constitution HBR 2- Great Barrington Declaration HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	Count
Founding Affidavit of Boutshitswe Preddy Mothopeng Msieleng, dated 14 December 2021 HBR1a- Applicant's Resolution to initiate legal 1 proceedings HBR 1b- HBR Constitution 23 HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	n
Msieleng, dated 14 December 2021 HBR1a- Applicant's Resolution to initiate legal 1 proceedings HBR 1b- HBR Constitution HBR 2- Great Barrington Declaration HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	1-6
Msieleng, dated 14 December 2021 HBR1a- Applicant's Resolution to initiate legal 1 proceedings HBR 1b- HBR Constitution 23 HBR 2- Great Barrington Declaration 1 HBR 3- Rome Declaration 3 HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD, SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	7-111
HBR 1b- HBR Constitution HBR 2- Great Barrington Declaration HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	
HBR 1b- HBR Constitution 1 HBR 2- Great Barrington Declaration 1 HBR 3- Rome Declaration 3 HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	112
HBR 2- Great Barrington Declaration HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	
HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD, SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	113-135
HBR 3- Rome Declaration HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD, SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	
HBR 4- Expert Report on the Johnson & Johnson COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	136
COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from 21 seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	137-139
COVID-19 Vaccine Michael Palmer MD,SucharitBhakdi MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from 21 seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	
MD, and Wolfgang Wodarg, MD HBR 5- Infection fatality rate of COVID-19 inferred from 21 seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	140-149
seroprevalence Data Prof. John P.A.Ioannidis HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	
HBR 6- PCR-test Expert Statement: Prof. U. Kämmerer 34	150 -170
UDD 7 «DOD :» · DOD	171-204
HBR 7- qPCR is not PCR Just as a Straightjacket is not 49	205-253

	a Jacket- the Truth Revealed by SARS-CoV-2 False		
	Positive Test Results: Dr. Sin Hang Lee	e-	
10	HBR 8- Post-lockdown SARS-CoV-2 nucleic aci		
	screening in poorly to a sur	d 7	254-260
	screening in nearly ten million residents of Wuhar China: Shiyi Cao et.al	٦,	
11	HBR 9- Peer Review Report by an International	al 81	201.011
	Consortium of Scientist in Life Sciences (ICSLS)	11 01	261-341
	Corman-Drosten et al.,	-	
	Eurosurveillance 2020 (Updated 2.12.2020)		
12	HBR 10- Spanish Court Case: Tribunal	24	
	da Relação de Lisboa	34	342-375
13	HBR 11- USA CDC CDC 2019Novel Coronavirus (2019-		
	nCoV) RealTime RTPCR Diagnostic Panel	80	376-455
14	HBR 12-Expert Statement Prof. Walach and others		
15		16	456-471
	HBR 13- SAHPRA Media Release	2	472-473
	Pfizer/BiontechComirnaty Vaccine Embargo: Immediate		
6	release 16 March 2021		
0	HBR 14- SAHPRA Media Release COVID-19	3	474-476
	Vaccine Janssen – GMP Concerns Embargo 7 June		
	2021		
7	HBR 15- Expert Report on the Pfizer	25	477-501
	COVID-19 Vaccine Michael Palmer MD,		
	SucharitBhakdi MD, and Wolfgang Wodarg, MD		
3	HBR 16- Citizen Affidavits	10	502-511
)	HBR 17- Ivermoetin December 51	10	302-511
	HBR 17- Ivermectin Research Electronic Links	5	512-516
,	HBR 18- Expert Statement- C-19 Lockdowns Children	9	517-525

21	HBR 19- Declaration of Helsinki		
	The state of the s	3	526-528
22	HBR 20- Nuremberg Code		
	and an acting code	71	529- 599
23	HBR 21-South Africa Cood Olivin La		
	HBR 21-South Africa Good Clinical Practice-Clinical	4	600-603
	Trials		

DATED at Johannesburg on this the __14th__ day of December 2021

Applicants Representative

Hola Bon Renaissance Foundation

88 MARSHALL STREET

2ND FLOOR, MARSHALLTOWN

JOHANNESBURG

Mobile: 0840544733

TEL:0681596956

EMAIL:INFO@HBRFOUNDATION.ORG.ZA

EMAIL: HBRFOUNDATION@GMAIL.COM

REF NO:VC2021/7

TO: THE FIRST RESPONDENT

President of the Republic of South Africa,

Union Buildings, Government Avenue, East Wing,

1st Floor, Arcadia, PRETORIA

C/O Office of the State Attorney

85 Albertina Sisulu Road

TO: THE SECOND RESPONDENT

Minister of Cooperative Governance and Traditional Affairs,

Dr. Nkhosazana Dlamini-Zuma

87 Hamilton Street, Arcadia

PRETORIA, 0083,

alternativelyUnion Buildings, Government Avenue, East Wing,

1st Floor, Arcadia, PRETORIA

TO: THE THIRD RESPONDENT

Minister of Health

Dr. Mathume Joseph Phaahla

Civitas Building, Floor 20, corner Struben and Thabo Sehume

Streets,

PRETORIA

TO: THE FOURTH RESPONDENT

South African National Disaster Management Centre

Riverside Office Park, Letaba House,2nd Floor

1303 Heuwel Avenue

Centurion

PRETORIA

TO: THE FIFTH RESPONDENT

South African Health Product Regulatory Authority

Building A, Loftus Park, 402 Kirkness Street

Arcadia

PRETORIA

0001

AND

TO: STATE ATTORNEY JOHANNESBURG

Attorneys of the Applicant

316 Thabo Sehuma Street

Pretoria Central

Email: ichowe@justice.gov.za

Ref:Mr I Chowe

AND

TO: THE REGISTRAR OF THE HONOURABLE CONSTITUTIONAL COURT