

DELIVERED BY EMAIL

Arnold Michael Stainbank
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YOUR REFERENCE:

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21 June 2019

Dear Mr Stainbank

THE SOUTH AFRICAN APARTHEID MUSEUM AT FREEDOM PARK ("our client")

- 1 I refer to your letter ("your letter") dated 10 June 2019 which was delivered to my offices.
- 2 At the outset, I emphasise that the failure to reply to any of the allegations and submissions contained in your letter is most certainly not to be construed as an admission as to the correctness or accuracy thereof, is without prejudice to both Werksmans' rights as well as our client's rights and in no way constitutes a waiver of the aforesaid respective rights. Werksmans does not intend to debate this matter further with you correspondence. Consequently, our failure to respond whether substantively or at all to any further letters you may resolve to address should similarly not be construed as an admission of any assertion you may in due course advance or as a waiver of our client's rights in this regard, which rights are similarly reserved.
- 3 Whilst I, in my capacity as Chairman of Werksmans Attorneys, was not involved in the various matters concerned, I am satisfied that at all times this firm properly represented our client and acted in our client's best interests. This is in fact and in law borne out by the below mentioned court orders -
 - 3.1 GLD Case No. 14590/2013; and
 - 3.2 SCA Case No. 532/201.
- 4 We confirm that your letter, which is replete with unlawful, injurious and defamatory statements, will be handed to our client for their attention. They will take such action as they consider appropriate in the circumstances.



5 Both Werksmans' and our client's rights remains strictly reserved.

Yours sincerely

David Hertz
Chairman : Werksmans Attorneys
THIS LETTER HAS BEEN ELECTRONICALLY TRANSMITTED WITH NO SIGNATURE.