

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

HERMAN BESTER N.O.

First Applicant

ADRIAAN WILLEM VAN ROOYEN N.O.

Second Applicant

CHRISTOPHER JAMES ROOS N.O.

Third Applicant

JACOLIEN FRIEDA BARNARD N.O.

Fourth Applicant

DEIDRE BASSON N.O.

Fifth Applicant

CHAVONNES BADENHORST ST CLAIR COOPER

Sixth Applicant

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

THE MASTER OF THE HIGH COURT,  
CAPE TOWN

Respondent

VARIOUS PARTIES SEEKING LEAVE TO INTERVENE

Intervening Parties

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SUPPLEMENTARY OPPOSING AFFIDAVIT  
OF THE INTERVENING PARTY KNOWN AS  
"THE EDJ INVESTORS"

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I the undersigned,

**ELNA DE JAGER**

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*17/11*

State under oath as follows:

1. The contents hereof fall within my personal knowledge and are both true and correct, unless it appears otherwise from the context.
2. I am an adult female attorney (identity number: 690620 0066 08 4) practicing as such in the name in and the style of **EDJ ATTORNEYS INC at 71 McHardy Drive, Brandwag, Bloemfontein, Free State.**

THE STATUS AND PURPOSE OF THIS AFFIDAVIT:

3. On 28 October 2022 intervening parties which are represented by me, and who identified themselves as the "EDJ Class 2 investors" delivered an opposing affidavit in the abovementioned application.
4. The purpose of that affidavit was to disclose limited grounds of objection to the rule nisi which the applicants sought to be confirmed on 31 October 2022.
5. On 31 October 2022 the legal representatives of the applicants and those who represented the parties, who by then indicated that they would intervene in the abovementioned application, including the EDJ Class 2 investors, agreed to extend the rule nisi until 11 April

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- 2023 and that further affidavits may be exchanged between the parties.
6. Consequently, the Honourable Justice Steyn extended the rule nisi subject to the condition as contained in the agreed draft court order, of which annexure "EDJ1" hereto is a copy.
  7. It was accepted that my clients, who were identified as "the EDJ Class 2 investors", intervened in the application.
  8. After the extension of the return date of the rule nisi, I have been instructed by the remainder of my clients, who include both Class 1 and Class 2 investors, as categorised in the application and rule nisi, to raise further grounds of objection to the rule nisi.
  9. For this reason, it has been resolved by my clients that I must depose to this affidavit, which is intended to supplement the affidavit which was delivered in the application on 28 October 2022.

IDENTIFYING THE EDJ INVESTORS, WHO ARE INTERVENING IN THE ABOVEMENTIONED APPLICATION:

10. I have been mandated by **2151** investors in the scheme which was offered to the public by Mirror International Trading (in liquidation)

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("MTI"), however, to date I have only received 877 completed mandates and claim forms for submission.

11. I am also the attorney of record of the fourth respondent, Mr Cecil John Jacob Rowe ("Mr Rowe") in the pending application before the Honourable Justice De Wet, bearing case number 15426/2021, concerning the validity of the investment scheme which MTI had offered to the public ("case number 15426/2021").
12. On 6 September 2022 the attorneys of the applicant in the abovementioned matter emailed to me a copy of the abovementioned application and the rule nisi which was granted by the Honourable Justice Dolamo on 31 August 2022 on an *ex parte* basis (herein referred to as "the rule nisi").
13. The present application is directly related to the issues which are raised in the case number 15426/2021.
14. In terms of the De Wet order the respondents and all other persons who intended to oppose the relief which is claimed by the applicants had to deliver their answering affidavits by 10 January 2021. Mr Rowe, together with other investors in the MTI scheme, whom I

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represent, were permitted to file a consolidated answering affidavit in case number 15426/2021. This group of investors are called the "the Rowe members" in case number 15426/2021.

15. The Rowe members are some of the investors who have instructed me in case number 15426/2021 as well as in the present application.
16. Apart from considering whether to oppose case number 15426/2021 and the present application, I was required to advise Mr Rowe and other investors about submitting their respective claims as creditors in the liquidation of MTI. Investors with claims would first and foremost be persons who fell into the same category as the Rowe members in that they are owed an asset value at the time of the *concursum creditorum* on 23 December 2020 (the section 348 date).
17. To date I have received 877 confirmed completed mandates from MTI subscribers who are all intending to lodge claims in the liquidation of MTI. All these members, including the Rowe members, have a direct and material interest in the outcome of this application. Annexure "EDJ2" hereto is list of my clients. This list is

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not conclusive as we are receiving mandates on a daily basis and more than one claim per person. A further list will be provided in due course. For present purposes my clients who seek leave to intervene in this application are referred to as "the EDJ investors".

18. All EDJ Investors who instructed me to assist them to protect their interests were required to give me a written mandate. Annexure "EDJ3" hereto is a copy of the standard mandate which was signed by the first client appearing on annexure "EDJ2", being the consolidated list of EDJ investors. The rest of the EDJ investors signed similar mandates. If challenged thereto, then I will produce the mandates.
19. The standard mandate, which was signed by all EDJ investors, authorise me to assist them "*in my Bitcoin Recovery matter*" and that this service will be rendered free of charge. In the mandate it is explained that the costs of the service "*will be covered by the MTI Members Justice Group represented by Cecil John Rowe and its funders*".
20. Presently, Mr Rowe has been left incapacitated due to poor health. In the circumstances Mr Charl Coetzee, an EDJ investor and an

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individual who has contributed towards the legal costs incurred during the opposition to case number 15426/2021 and the present application, confirms in his attached confirmatory affidavit that I have been mandated on behalf of the EDJ members to assist them in all administrative and legal processes concerning the recovery of the investment they have lost when MTI was liquidated. Annexure “EDJ4” hereto is the confirmatory affidavit of Charl Coetzee.

21. The parts of the rule nisi which will be material to any claims which the EDJ investors may institute against the insolvent MTI estate, and which they object to are as follows:

21.1. The present application is premature in the sense that there has not yet been a determination in case number 15426/2021 about whether the MTI Scheme is an unlawful pyramid scheme;

21.2. The EDJ investors object to the order insofar as it intends limit their claims in the insolvent estate to liquidated claims only;

21.3. All the Class 1 investors, forming part of the EDJ investors, object to prayer 2.4.1.2, which proposes to calculate the

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claims of the Class 1 investors "*in Rand value, as at the date upon which the relevant investor(s) made the relevant investment in the Scheme*"; and

21.4. The Class 2 investors object to:

21.4.1. Prayer 2.4.2.4, which proposes that the claims of the Class 2 investors should be calculated in Rand value, on date of investment; and

21.4.2. Prayers 2.4.2.7 to 2.4.2.10, which proposes that despite that any "*Returns*" received by the Class 2 investors must be deducted from the claims of Class 2 investors, the applicants reserve the right to claim the repayment of the Returns from the Class 2 investors as voidable or undue preferences as contemplated in sections 29 and 30 of the Insolvency Act, 24 of 1936 ("the Insolvency Act").

22. Due to the volume of EDJ Class 1 and 2 investors, and because they are scattered all over South Africa, it is impossible to acquire each of their confirmatory affidavits. In the circumstances it was decided to adopt a practical approach by submitting my clients'

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objection to the rule nisi through this affidavit, which I depose to on their behalf.

23. Five of the Class 1 investors, forming part of the EDJ investors made confirmatory affidavits, confirming the correctness of my statement. Annexures "EDJ5" to "EDJ9" are the confirmatory affidavits of the five Class 1 investors.
24. Seven of the Class 2 investors, forming part of the EDJ investors made confirmatory affidavits, confirming the correctness of my statement. Annexures "EDJ10" to "EDJ16" are confirmatory affidavits of the seven Class 2 investors.
25. It is herewith prayed that the above Honourable Court permit the EDJ investors as identified above, as intervening parties in the present application, and that this affidavit serves as the consolidated opposing affidavit of the Class 1 and Class 2 investors forming part of the EDJ investors.

THE APPLICATION IS PREMATURE:

26. The present application seeks an order which would essentially limit the claims of any investor in the MTI Scheme to what is contained in the rule nisi.

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27. The applicants maintain that there are two scenarios which may determine what cause of action lay the foundation for the claims of the investors. If the Court finds in the case number 15426/2021 that the MTI Scheme was an illegal pyramid scheme, then the investors would be limited to enrichment claims, whilst if the MTI Scheme is not an unlawful pyramid scheme, then the claims of the investors would be founded on the terms of the contractual relations between them and MTI.
28. Until such as the Court pronounce on the validity of the MTI Scheme, the investors are unable to determine on what cause of action their claims should be founded.
29. The present application has been prematurely brought because there has not yet been judgment in case number 15426/2021.
30. It is submitted that the present application must be held in abeyance until case number 15426/2021 has been finalised.

JURISDICTIONAL ISSUE:

31. In terms of section 387(1) of the Companies Act, 1973, the liquidators "*shall, in the administration of the assets of the company, have regard to any directions that may be given by resolution of the*

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*creditors or members or contributories of the company at general meeting*". The applicants did not motivate the bringing of this application on the basis of this provision.

32. In the present application the applicants "*approach this Court for guidance in terms of section 387(3) of the 1973 Act, which permits the Court to give directions in relation to any matter arising in the winding-up. Such matter also include any question of law and in cases of doubt the liquidators should, for their own protection, approach the Court*" (see paragraph 36.4 of the founding affidavit).

33. Before section 387(3) becomes applicable, the circumstances as contemplated in section 387(2) must have arisen, namely: "*In regard to any matter which has been submitted by the liquidator for the directions of creditors and members or contributories in general meeting, but as to which no directions have been given or as to which there is a difference between the directions of creditors and members or contributories, the liquidator may apply to the Master for directions and the Master may give or refuse to give directions as he may deem fit*".

34. The applicants have failed to substantiate their application for "*the Court to give Directions*" in the circumstances as provided in section

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378(3), wherefore the above Honourable Court does not have the authority to come to the assistance of the applicant. For this reason alone, the application should be dismissed with costs.

35. Ancillary to the afore going submission, regard must be had to the provisions of section 44 of the Insolvency Act, which concerns the proving of liquidated claims against the estate. In terms of section 44(3) of the Insolvency Act a claim of a creditor "*shall be proved at a meeting of the creditors of that estate to the satisfaction of the officer presiding*".
36. The present application seeks to obtain a court order in terms of which "*directives*" are given about the manner, the cause of action and the calculation of any claim by the investors in the MTI Scheme may submit claims.
37. If the order is granted in its present form, it would certainly limit the discretion of the officer presiding at the meeting of creditors where claims are submitted in terms of section 44 of the Insolvency Act. If granted, then the officer presiding would simply have to follow the Court's "*directives*" without exercising its statutory imposed discretion to admit or reject the submitted claim.

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38. The applicants failed to lay a factual and legal basis why the above Honourable Court would have the jurisdiction to make an order which would limit the officer presiding as contemplated in section 44(2) of the Insolvency Act.

THE OPPOSITION OF THE CLASS 1 AND CLASS 2 INVESTORS  
AGAINST LIMITING THE CAUSES OF ACTION:

39. I repeat that in terms of prayers 2.4.1.2 and 2.4.2.4 the applicants propose that the claims of Class 1 and 2 investors must be calculated in Rand value as at the date when the investments were made.
40. The applicants ask the question in paragraph [E] (i) of the founding affidavit: "*What is the nature of Bitcoin and what is its classification in an insolvent estate?*".
41. In paragraph 116.4 the applicants conclude that "*it is quite clear that Bitcoin, whatever its description or legal nature is, falls within the very wide definition of property in section 2 of the Insolvency Act, 24 of 1936 ("the Insolvency Act"). Likewise, a wide meaning should be given to the word "disposition" to include any act by which an insolvent parts with any asset in whatever form in his estate.*"

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42. In paragraph 118.1 of the founding affidavit the applicants submits that the claims of investors may be regarded as "*liquidated claims*" "*first being that the transfer of Bitcoin constituted payment in terms of the MTI agreement, which sounded in money at the prevailing conversion rate on the day of the investment and the second being that, in the event of Bitcoin being regarded as intangible property, the investor parted with such intangible property with a market value that was easily determinable*".
43. The departure point of the applicants is that the MTI agreements are void *ab initio* (paragraph 118.3 of the founding affidavit) and that in such event the investors would be "*vested with a claim against the insolvent estate premised on a cause of action in enrichment, particularly the *condictio ob turpem vel iniustam causam**" (paragraph 118.10 of the founding affidavit).
44. The applicants appear to hold the position that the investors would only have "*liquidated claims*" as contemplated in section 44 of the Insolvency Act.
45. This approach ignores the possibility that the investors in the MTI Scheme will have another cause of action against the insolvent company which is founded on delict.

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46. On the version of the applicants, the MTI Scheme was founded on a massive fraud in terms of which it was falsely represented to the world that a legitimate investment opportunity existed, whilst in truth and in fact the MTI Scheme was by design an unlawful pyramid scheme which was doomed to fail because there was no legitimate source of income.
47. If the above Honourable Court finds in case number 15426/2021 that the business model of MTI was founded on an illegal pyramid scheme, and that all contracts which were entered between MTI and the investors are void *ab initio*, then the innocent investors, who were induced to participate in the unlawful investment scheme by the false representations of MTI, would have the option to claim delictual damages from the estate, which resulted from the false representations of MTI. Admittedly, such claims would be unliquidated claims.
48. Section 78(3) of the Insolvency Act makes provision therefor that: "*if authorised by the creditors, ..., the trustee may compromise or admit any claim against the estate, whether liquidated or unliquidated if proof thereof has been duly tendered at a meeting of creditors.*"

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49. And further in section 78(3): *“When a claim has been so compromised or admitted, or when it has been settled by a judgment of a court, it shall be deemed to have been proved and admitted against the estate in the manner set forth in section forty-four...”*.
50. An investor who was induced to participate in the MTI Scheme was required to transfer Bitcoin, and not fiat currency, to MTI. The loss of the transferred Bitcoin constitutes the damages. It is thus foreseeable that an investor who institutes a delictual damages claim will claim the loss of the value of the transferred Bitcoin.
51. It is reasonable to accept that had it not been for the liquidation of MTI, and assuming that the Court will declare the MTI Scheme unlawful as meant in case number 15426/2021, then an investor in the MTI Scheme would have been permitted to withdraw his invested Bitcoin at any time. To place the investor in the position in which he would have been had the delict not been committed (the false representations which induced the investor to part with his Bitcoin) then the investors would be entitled to claim the value of the Bitcoin on the date of summons (i.e. the date when the claim is made) as delictual damages.

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52. Such a claim for delictual damages may be instituted in a Court of Law against the applicants, as the official representatives of the insolvent estate of MTI or it may be submitted in terms of section 78(3) of the Insolvency Act.
53. The entire scheme of the rule nisi is premised on the assumption that the claims of Class 1 and 2 investors are limited to an enrichment claims, insofar as it is found that the MTI Scheme is an unlawful pyramid scheme (what is referred to by the applicants as “the first scenario”).
54. In terms of the rule nisi the claims of Class 1 and 2 investors must be limited to an amount equal to amount of their investment in the MTI Scheme, calculated on the date of investment. The applicants motivate this position on the ground that the investors would have an enrichment claim (as per paragraph 118.10 of the founding affidavit) and that the investors would be entitled to “*reclaim the deposits*” which they have made (see paragraph 118.12 of the founding affidavit).
55. The rule nisi constitutes a limitation of the fundamental right which a person has in terms of section 34 of the Constitution of the Republic of South Africa, 1996, which provides that: “*Everyone has*

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*the right to have any dispute that can be resolved by the application of law decided in a fair public hearing before a court or, where appropriate, another independent and impartial tribunal or forum".*

The rule nisi limits the right of investors to make an election which cause of action to employ when instituting their claims against the insolvent estate.

56. The rule nisi is objectionable insofar as it is intended to limit the causes of action which an investor may rely on to claim against the estate to only an enrichment claim.

THE OBJECTION AGAINST THE PROPOSED CALCULATION METHOD OF CLAIMS:

57. As pointed out above, the rule nisi proposes that the claims of the Class 1 and 2 investors should be calculated in Rand value as the date when the investor made the relevant investment or deposit.

58. Insofar as the claims which Class 2 investors are concerned the applicants contend that the value of a Class 2 investors should be calculated in Rand value, as at the date upon which the relevant creditor made the relevant investment. This is the date upon which

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the repayment of the investment becomes due, according to the case of "*Fluxmans*".<sup>1</sup>

59. It is submitted that the case of *Fluxmans* is not only inapplicable because it dealt with when a debt became due for prescription purposes, but it is also distinguishable on the facts. The present debate does not concern when the debt which is owed to the impoverished claimant in an enrichment claim, becomes due, but it is rather about when must an enrichment claim be assessed.
60. It is submitted on behalf of the EDJ investors, and as opined by Adv Jannie van der Merwe SC (annexure FA13.2 to the founding affidavit) an enrichment claim is to be assessed at the time of the institution of the action.
61. The investors did not make payment to MTI nor was any payment in Rand made to MTI at the time when the investments were made. At the time when the investments were made, Bitcoin was transferred to MTI.

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<sup>1</sup> Reported by Juta as *Fluxmans v Levenson* 2017 (2) SA 520 (SCA)

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62. It is common cause that the investors transferred their Bitcoin to MTI, in pursuance of investing in the MTI Scheme (see paragraph 62 of the founding affidavit).
63. Bitcoin is not money. It can be accepted that Bitcoin is property, probably best described as an intangible asset, having an ascertainable value expressed in fiat currency, which fluctuates.
64. The investors remain deprived of the transferred Bitcoin to date.
65. It is trite that where money or other property has been transferred in terms of an illegal agreement, the *condictio ob turpem vel iniustam causam* is available to recover that which has been transferred or the value thereof ("the condictio").<sup>2</sup>
66. The requirements of the condictio are that:
- 66.1. Ownership of the property must have passed with the transfer;
- 66.2. The transfer must have taken place in terms of an illegal agreement, an agreement, that is the conclusion,

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<sup>2</sup> *Jajbhay v Cassim* 1939 AD 537; *First National Bank of Southern Africa Ltd v Perry* 2001 (3) SA 960 (SCA)

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performance or object of which is prohibited by law or is contrary to good morals or public policy; and

- 66.3. In terms of the Roman and Roman-Dutch Law the plaintiff must be free of *turpitude*. The requirement was justified based on the *pari delictio* principle. This requirement was later qualified by our Appellate Division to the effect that the rule may be relaxed where "*it is necessary to prevent injustice or to promote public policy*".<sup>3</sup>
67. In terms of the *condictio* the defendant is liable to restore the transferred thing with its fruits (less production costs) and accessions.<sup>4</sup>
68. Where the thing has been lost or destroyed in the hands of the defendant, the defendant remains liable to restore its full value.<sup>5</sup>
69. Should an investor elect to make a claim against the insolvent estate based on the *condictio* it will be for the return of the property which was transferred to MTI in terms of an invalid agreement. The claim is not for the return of the money, but Bitcoin.

<sup>3</sup> *Jajbhay v Cassim* (supra), at 544 - 550

<sup>4</sup> LAW OF SOUTH AFRICA, Lexis Nexis, Second Edition, Volume 9, par 216 and the authorities referred to therein

<sup>5</sup> *Minister van Justisie v Van Heerden* 1960 (4) SA 377 (O), at 382

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70. It is only when the property has been lost or destroyed that the value of the property will be claimed.
71. It appears from the founding affidavit of the applicants that only a fraction of the Bitcoin which was transferred by the investors in MTI was recovered (1 281 Bitcoin) which has been sold for a value of R1 058 176 013.69 (see paragraph 111 of the founding affidavit). According to the applicants, there should have been a total of 10 866,87 Bitcoin remaining with MTI after provisional liquidation on 29 December 2021 (see paragraph 108 of the founding affidavit). All those Class 1 and 2 investors forming part of the EDJ investors, who have to date not received their transferred Bitcoin, must accept that their Bitcoin has been lost. Therefore, claims of the Class 1 and 2 investors against the insolvent estate of MTI will be for the value of their Bitcoin.
72. The question now arises how and at what time the value of the transferred property must be calculated?
73. It has been suggested that the defendant in a claim in terms of the *condictio* is probably entitled to compensation for his necessary and useful expenses on the thing.<sup>6</sup> However, it has been held that

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<sup>6</sup> THE LAW OF SOUTH AFRICA (supra)

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before the plaintiff can succeed, he must tender return of any counter-performance made by the defendant.<sup>7</sup>

74. The value of the assets which is sought is not equal to the value for which it had been initially acquired. This conclusion is drawn from the fact that the value of any necessary and useful expenses and/or the value of any counter-performance, which must have been incurred after the date of acquisition and transfer, must be deducted from the value of the transferred thing. From this requirement it follows that it cannot be the initial acquisition value alone, which is determinative of the impoverishment of the innocent plaintiff in an enrichment claim.
75. *In casu*, the applicants maintain that in the case of Class 2 investors, any Returns which were made to them while the relationship between them and MTI existed, the Class 2 investors would have to "account" for the returns, and that the value of the returns must be deducted from the initial investment.
76. The mere fact that the Returns, taking place on date(s) after the date of investment, and the requirement to take the Returns into account to assess the impoverishment of the investor, leads to the

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<sup>7</sup> *Albertyn v Kumalo* 1946 WLD 529; *Lydenburg Voorspod Ko-operasie v Els* 1966 (3) SA 34 (T)

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inevitable conclusion that the impoverishment of the investor is not assessed at the date of investment, but at a later date.

77. Furthermore, since Bitcoin was transferred when the initial investment was made and because Bitcoin was later returned, makes it clear that the value of impoverishment must be determined in Bitcoin value.
78. At the date of *concursum creditorum* the Class 1 and 2 investors was deprived of the return of the full value of their investments, calculated in Bitcoin, at the date of liquidation.
79. Although the authorities confirm that enrichment must be determined at the date of claim, it is submitted that in the unique circumstances of a liquidated company, the assessment should be made at the date of *concursum creditorum*. This position is justified on the ground that by definition the date of *concursum creditorum* is the date of the rush (concourse) of all of the creditors of the insolvent. Put differently, it is the date of simultaneous claims by all creditors.<sup>8</sup>

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<sup>8</sup> Trilingual Legal Dictionary, Hiemstra & Gonin, Juta, 1981, p168

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80. Although MTI did not have all the Bitcoin of the investors it was supposed to have in hand on the date of liquidation, the loss of the Bitcoin must be directly attributed to the fault (*turputido*) of MTI. Thus, MTI may not rely on the loss of the Bitcoin as diminishing its enrichment at the date of liquidation.
81. In the above stated circumstances, the EDL investors maintain that if they elect to institute their claims on the basis of the *condictio*, then:
- 81.1. their claims must be assessed on the date of *concursum creditorum*;
  - 81.2. The impoverishment will be the transfer of the asset known as, less any returned Bitcoin;
  - 81.3. The enrichment is Bitcoin which was supposed to be available to be returned to the investor on date of liquidation, thus being the same amount of Bitcoin which was invested, less any returns;
  - 81.4. All assets of the insolvent MTI must be accumulated and liquidated by the liquidators, thus reduced to Rand value; and

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- 81.5. Hence any claims at the time of *concursum creditorum* will be in Rand value, because the insolvent would be unable to return the invested Bitcoin.
82. A fact which the applicants did not disclose to the Honourable Court in full is the value difference of Bitcoin over the period the MTI Scheme operated and the influence it will have on the claims of the investors.
83. Take for example of Mr Paulus Stephanus Swanepoel, who was one of five EDJ Class 2 investors who deposed to a confirmatory affidavit when my office filed the initial opposing affidavit on behalf of the EDJ Class 2 investors. On 25 June 2020 he made an investment 4.474424684 Bitcoin with MTI. During June 2020 the value of Bitcoin as expressed in USD was 9263 USD for one Bitcoin. .
84. Over the period 9 July 2020 to 20 November 2020, Mr Swanepoel received Returns of 1,21697276 Bitcoin. During November 2020 Bitcoin was valued at 13 758 USD for one Bitcoin.
85. By the date of liquidation on 23 December 2020 the value of Bitcoin had risen to an astounding 29 374 USD for one Bitcoin. This meant

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the value of Bitcoin increased about 300% in value since January the same year.

86. Applying the value increase to the MTI situation means that by the date of liquidation the Bitcoin which investors transferred to MTI during 2020 have considerably increased in value. In other words, the enrichment of MTI was not only the receipt of the investors' Bitcoin, but also the increase in value of the Bitcoin.
87. If the assessment of the enrichment and impoverishment of claims against the estate is to be made on the basis as proposed by the applicants, then MTI will be advantaged by its unlawful pyramid scheme, by benefiting from the increased value of the Bitcoin which was transferred to MTI for the duration of the MTI scheme.
88. It is submitted that MTI may not benefit from its unlawful scheme (if the scheme is found to be unlawful) when the assessment of impoverishment and enrichment is made.
89. It is therefore submitted that the value of investors' claims must be assessed in Bitcoin value at the date when there is the rush (or concourse) of claims, i.e. on the date of liquidation. The Bitcoin value is then converted to the relevant fiat currency value on the

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date of liquidation, and that constitutes the claim value of the investor.

90. For the above stated reasons the EDJ investors object to the inclusion of prayers 2.4.1.2 and 2.4.2.4 of the rule nisi.

THE OPPOSITION OF THE CLASS 2 INVESTORS:

91. The proposed rule nisi proposes that the liquidators would be “vested” with the right to claim any Returns on any investments which were made by those persons known as the Class 2 investors, even if the Returns are deducted from the investments of claimants. The EDJ Class 2 investors object to what is prayed for in this regard in prayers 2.4.2.7 to 2.4.2.10 of the rule nisi.
92. If the above Honourable Court finds in case number 15426/2021 that the MTI Scheme is an unlawful pyramid scheme, then they acknowledge that one cause of action which will be available to them is for an enrichment claim in terms of the *condictio*.
93. Further, if such is the finding in case number 15426/2021, and if the Class 2 investors elect to base their claims on the *condictio*, then their claims must be subject to the following:

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- 93.1. The value of their claims must be assessed on the date and in the manner described herein above;
- 93.2. The Returns were not profits which were paid in terms of the MTI Scheme;
- 93.3. The deduction of the Returns was a form of counter-performance, which must be deducted from the initial investment;
- 93.4. The investment and the Returns were made in Bitcoin;
- 93.5. The difference between the initial investment, expressed in Bitcoin, less the Returns constitutes both the value of the impoverishment of a Class 2 investor, as well as the enrichment of MTI; and
- 93.6. Once the Returns had been considered for purposes of calculating the enrichment and impoverishment, there vests no further claims with the applicants against Class 2 investors to repay to the estate any Returns as dispositions in terms of sections 29 and 30 of the Insolvency Act.

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94. According to prayer 2.4.2.1 of the rule nisi Class 2 Investors will have to "account towards the estate for any Return(s) on their so-called investments in the Scheme".
95. In terms of prayer 2.4.2.2 "the Liquidators must ensure that the Returns are taken into account and subtracted from the investments made by the Class 2 Investors in the Scheme, so that those Returns may ultimately be applied in reduction of their claims against MTI".
96. According to prayer 2.4.2.3 "Class 2 Investors should be permitted to submit a claim against the estate in an amount equal to their impoverishment or the Company's enrichment, whichever is the lesser, which is in turn to be quantified by subtracting the properly quantified Return(s) from the properly quantified Investment(s) of the relevant investor(s), the result of which will represent either one or both of the Investors' impoverishment or the Company's enrichment;"
97. In prayers 2.4.2.7 to 2.4.2.10 the rule nisi provides as follow:  
"2.7.2.7 the Liquidators will be vested with claims against the Class 2 Investors for repayment of the Returns, in terms of section 29 and

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*30 of the Insolvency Act, despite the fact that the Class 2 Investor's claim may have been reduced to account for the same Return when that Investor proved a claim in the estate, when and where the circumstances so permit;*

*2.4.2.8 liquidators may pursue the Class 2 Investors in respect of the Returns, in terms of either section 29 or 30 of the Insolvency Act, when and where the circumstances so permit;*

*2.4.2.9 when a Return paid to a Class 2 Creditor is set aside by a Court in terms of section 29 or 30 of the Insolvency Act, that Return [in whatever form contemplated by section 32(3) of the Insolvency Act, will be repaid/returned to the estate, to form part of the assets available for ultimate distribution to the creditors in the form of a dividend;*

*2.4.2.10 in such event the Class 2 Investor concerned should be afforded an opportunity of proving an additional claim against the estate, in relation to the Return in question;..."*

98. The claims of Class 1 and Class 2 Investors, as contemplated in the rule nisi, are premised on the above Honourable Court finding in case number 15426/2021 that the MTI Scheme is an unlawful

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pyramid scheme and that all transaction under that Scheme are unlawful.

99. Although the applicants accept that an assessment of the enrichment or impoverishment in the case Class 2 investors should be made by deducting from the invested amount any Returns received by the Class 2 Investors, the liquidators insist that any Returns should be returnable to the estate in terms of section 29 or 30 of the Insolvency Act. If this is permitted, then the Class 2 Investors will become liable to a reduction of their claims for any Return of their investment and they will have to repay to the estate the value of the Return, at the date of the return.
100. As demonstrated above, the value of Bitcoin increased considerably during 2020. If the applicants are allowed to have the Returns valued at the fiat currency value of the Bitcoin at the time of the Return and be allowed to claim the Returns as dispositions at that same increased value, then the estate, who perpetrated the unlawful pyramid scheme (on the applicants' version) will benefit twice at the increased value of the Bitcoin, whilst the investors must be satisfied to have their claims (for their impoverishment) to be assessed at the far lesser value of when they have made their investments. Such a state of affairs is not only inherently unfair, but

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is does not accord with the manner in which the value assessment is made when the *condictio* applies.

101. The section 29 and 30 claims as proposed by the liquidators for the repayment of the Returns, in addition to the reduction of the claims of the Class 2 Investors is untenable in law and in fact. Once it is recognised that the Company received the value benefit of a reduction of a claim of a Class 2 Investor to the value of the Returns, the estate cannot be doubly compensated by claiming (and receiving) the repayment of the value of the same Returns.
102. Put differently, such a reduction of the claim of the Class 2 Investor extinguishes the right of the liquidators to claim the return of the same amount which was deducted from the claim of the Class 2 Investor.
103. The proviso which is proposed in prayer 2.4.2.10, namely to allow the Class 2 Investor to submit a secondary claim, for the amount which has to be repaid as a Return payment makes no logical sense and will result in an absurdity. The absurdity results from the fact that once the Returns are to be repaid in terms of section 29 or 30 of the Insolvency Act, the only conceivable way in which the Class 2 investor may "claim" it, is to insist that the amount with

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which the initial claim for the payment of the initial investment, less the reduced amount, must be adjusted upwards with the value of the Returns.

104. Within the context of the MTI Scheme any investor who is faced with a claim for the return of a disposition in terms of section 29 that the disposition, may prove that the disposition was made within the normal course of business. The fact that the protagonists of the MTI scheme made Returns to Class 2 investors, whilst knowing that they perpetrated an unlawful pyramid scheme does not mean that the disposition was not made in the normal course of the business.
105. In deciding whether a disposition or payment amounts to a “voidable preference” as intended in section 29(1) of the Insolvency Act or is a non-impugnable disposition made “in the ordinary course of business” without the intention to prefer one creditor over another, the Court has to scrutinise the nature of the obligation in terms of which the disposition or payment was made. If it was made under a valid contract and by the due date it was made in the ordinary course of business, and is unaffected by the general illegality of the insolvent's business model.<sup>9</sup>

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<sup>9</sup> *Gazit Properties v Botha and Others* NNO 2012 (2) SA 306 (SCA )

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106. It has been part of the agreement between MTI and its investors that any invested Bitcoin shall be returned at any time. There is nothing illegal about such an agreement. Therefore, it cannot be said that when Returns were made to investors then such Returns it were made outside the ordinary course of business.
107. If the applicants should attempt to reclaim the Returns as an undue preference as contemplated in section 30 of the Insolvency Act, then it follows from the agreement to return any part of invested Bitcoin to the investor who wants his investment back, that such an investor receives no more than what was part of his own invested Bitcoin, i.e. it cannot be said that to have been unduly benefitted when he received return of part of of his original investment.
108. In the circumstances the EDJ Class 2 investors specifically object to the order as proposed in prayers 2.4.2.7 to 2.4.2.10 of the rule nisi.

ANSWERING TO THE FOUNDING AFFIDAVIT:

109. Since the present application is unique in the sense that the applicants seek "directives" from the Honourable Court and since much of the founding affidavit contains the submissions of the applicants, the opposition of the EDJ Investors to the application

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has been set out above. Herein below I will attempt to limit the *seriatim* response to the founding affidavit as much as practically possible.

110. AD PARAGRAPHS 1 TO 6

Without admitting the correctness of all the sources of information which are relied on by the applicants, the contents of this paragraph are noted.

111. AD PARAGRAPHS 7 TO 16

111.1. The contents of these paragraphs are admitted.

111.2. Insofar as it may be necessary, it is herewith requested that the EDJ investors, as identified herein above, are permitted to intervene in this application.

112. AD PARAGRAPH 17 TO 28

The contents of these paragraphs are noted.

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113. AD PARAGRAPHS 17 TO 40

113.1. Save to deny that the applicants have made out a case to apply for "directives" from the above Honourable Court in terms of section 387(3) of the Companies Act, 1973, the remaining contents of these paragraphs are noted.

113.2. The EDJ investors oppose the application on the grounds as set out above.

114. AD PARAGRAPHS 41 TO 114

114.1. In general, the EDJ investors accept the facts which led to the liquidation of MTI.

114.2. Insofar as the contents of these paragraphs offers a reiteration of the applicant's case in pending case number 15426/2021, the EDJ investors maintain that the issues are yet to be decided.

114.3. Once there has been a determination of the issues in case number 15426/2021 then the applicants may be placed in a position to approach the above Honourable Court for

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directives, if the need arises as contemplated in section 387(3) of the Companies Act, 1973.

114.4. Presently, the facts in these paragraphs may only serve as a factual matrix within which the applicants decided to bring this application.

115. AD PARAGRAPH 115 TO 117

115.1. The contents of these paragraphs are noted.

115.2. I reiterate that the EDJ investors submit that Bitcoin is an intangible asset, comparable with *res fungibles*.

115.3. The transfer or deposit which was made with MTI by investors was Bitcoin.

115.4. At all relevant times during the existence of the MTI Scheme, MTI and the investors transacted with each other in Bitcoin.

116. AD PARAGRAPHS 118.2 AND 118.2

116.1. The contents of these paragraphs are disputed on the grounds set out above.

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116.2. Although the EDJ investors agree that, at their choice, they may lodge liquid claims against the estate, It is repeated that their remedies are not limited to what is proposed by the applicants.

117. AD PARAGRAPHS 118.3 TO 118.4

Although the two scenarios as sketched by the applicant are possible, the mere mentioning of the two possibilities emphasises the legal uncertainty before case number 15426/2021 is decided.

118. AD PARAGRAPHS 118.6 TO 118.9

The classification of the three categories of investors is accepted.

119. AD PARAGRAPHS 118.10 AND 118.11

The condictio offers a cause of action to the investors, but they are not necessarily limited thereto.

120. AD PARAGRAPH 118.12

The contents of this paragraph are denied.

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121. AD PARAGRAPH 118.13

The contents of this paragraph are noted.

122. AD PARAGRAPHS 118.14 AND 118.15

Legal argument will respond hereto.

123. AD PARAGRAPH 118.6

The contents of this paragraph are admitted.

124. AD PARAGRAPHS 118.17 TO 118.17.118.18.3

The contents of these paragraphs are denied insofar as they implicate the Class 2 investors.

125. AD PARAGRAPH 119

The applicants failed to make out a case for the relief they claim.

126. AD PARAGRAPHS 120 TO 120.6.17.3

The contents of these paragraphs are disputed on the grounds as set out herein above.

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127. AD PARAGRAPHS 120.6.18 TO 120.17

The contents of these paragraphs do not concern the opposition which is put up by the EDJ investors.

128. AD PARAGRAPHS 120.18 TO 128

The submissions which are made by the applicants are opposed on the grounds as set out herein above.

129. AD PARAGRAPHS 129 TO 142

The contents of these paragraphs are disputed. Not only was the application not urgent, it is also premature before case number 15426/2021 has been decided.

130. AD PARAGRAPHS 140 TO 156

130.1. Save to admit that the rule nisi and the application was "served" on my offices by email, the remaining contents of these paragraphs are disputed.

130.2. Insofar as the rule nisi required interested parties to appear in Court on 31 October 2022, my office attempted to avoid the necessity to appear in Cape Town. Annexure "EDJ17"

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hereto is letter I wrote to the applicants' attorneys on 28 October 2022 and provided them with our opposing affidavit to ensure that we submitted before the date of hearing.

130.3. I received a response from the applicant's attorneys on 28 October 2022 stating that Advocate Pieter Lourens will appear on behalf of the applicants on Monday. The response is attached hereto as Annexure "EDJ18".


130.4. It was only on Saturday 29 October 2022, at 22:13 that my office received an email from the applicants' attorneys, proposing a postponement of the matter. Confirmation of such email is attached as Annexure "EDJ19".

130.5. By then counsel was briefed and the expense incurred for me and counsel to appear in Cape Town on 31 October 2022.

130.6. In the circumstances the applicants are required to pay the wasted costs which were occasioned by the postponement of the application on 31 October 2022.

131. In the above stated premises the EDJ investors move that the application is dismissed with costs.

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DEPONENT

Sworn to and signed in my presence at Bloemfontein on this 21 day  
of November 2022 by the deponent who declared that she:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on her conscience;

and uttered the words: *"I swear that the contents of this affidavit are true, so help me God."*

  
COMMISSIONER OF OATHS

Natalie Huyser  
Commissioner of Oaths  
Chartered Accountant (SA)  
71 Mc Hardy Drive  
Brandwag  
Bloemfontein  
051 - 4104260  
email: [natalie@djenkie.co.za](mailto:natalie@djenkie.co.za)

"EDJ 1"

Handwritten signature and date: 31.10.22

BOX 97

RULE NISI

**IN THE HIGH COURT OF SOUTH AFRICA  
(WESTERN CAPE DIVISION, CAPE TOWN)**

Cape Town, Monday, 31 October 2022  
Before the Honourable Madam Justice Steyn

Case No: 13721/2022

The application between:

**H BESTER N.O.**

First applicant

**AW VAN ROOYEN N.O.**

Second applicant

**CJ ROOS N.O.**

Third applicant

**JF BARNARD N.O.**

Fourth applicant

**D BASSON N.O.**

Fifth applicant

**CBS COOPER N.O.**

Sixth applicant



(Cited in their capacities as the joint liquidators of Mirror Trading International (Pty) Ltd [in liquidation])

and

**THE MASTER OF THE HIGH COURT, CAPE TOWN**

Respondent

**VARIOUS PARTIES SEEKING LEAVE TO INTERVENE**

Intervening Parties

**ORDER**

**THE FOLLOWING ORDER IS GRANTED BY AGREEMENT:**

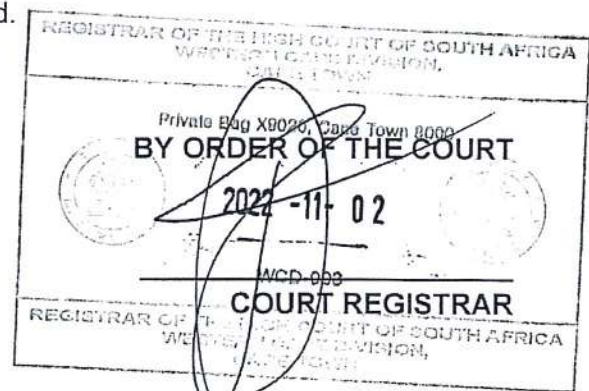
(97)

Mostert & Bosman  
Per: P Du Toit  
[AntoinetteE@mbalaw.co.za](mailto:AntoinetteE@mbalaw.co.za)  
021 914 3322

Handwritten signature: Edg



1. The return date of the provisional order granted by this court on 31 August 2022 under the above case number is extended until 11 April 2023 and the main application is accordingly postponed.
2. The parties who have, as at the date of this order, applied for leave to intervene in the main application ("the intervening parties") shall deliver their answering affidavits, or any further answering affidavits that they intend to file in respect of the the main application, by 30 November 2022.
3. The applicants shall deliver their answering affidavits in respect of the intervening parties' intervention applications, together with their replying affidavits in response to the intervening parties' answering affidavits and/or responses to any other affidavit contemplated by paragraph 2 above, by 31 January 2023.
4. The intervening parties shall deliver their replying affidavits in relation to their respective intervention applications by 28 February 2023.
5. Once the exchange of affidavits have been finalised the parties shall approach the Deputy Judge President for such further directives as may be required to ensure that the application is ready for hearing on the allocated date.
6. All issues concerning costs are reserved.



Mostert & Bosman  
Per: P Du Toit  
[AntoinetteE@mbalaw.co.za](mailto:AntoinetteE@mbalaw.co.za)  
021 914 3322  
BOX 97

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"EDJ 2"

## EDJ INVESTORS LIST

### **Name**

|    |                              |
|----|------------------------------|
| 1  | Cecil Rowe                   |
| 2  | Jason Caruana                |
| 3  | Jacobus Johannes Oosthuizen  |
| 4  | TR Peter Bowyer              |
| 5  | Emiel Nel                    |
| 6  | Jivesh Rhugbeer              |
| 7  | Hilmary Teana Papier         |
| 8  | Gerhardus Petrus Engelbrecht |
| 9  | Devon Stewart Herla          |
| 10 | Emmerick Simard              |
| 11 | Anabel Ferland               |
| 12 | Adel Fasen                   |
| 13 | RE Van Der Merwe             |
| 14 | Charmaine Coetzee            |
| 15 | Adrenah Kaungwe Mukela       |
| 16 | Sara Van Schalkwyk           |
| 17 | Corneli Grobler              |
| 18 | Henry Robert Jenkins         |
| 19 | Samantha Blume               |
| 20 | Karen Ann Phillipson         |
| 21 | Abigail Lymoa Owen           |

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|    |                            |
|----|----------------------------|
| 22 | Aamir Khan                 |
| 23 | Thilavenee Khan            |
| 24 | Shahrukh Khan              |
| 25 | John Mark Donnelly         |
| 26 | Fountain of Youth          |
| 27 | Henriette Kirby            |
| 28 | Jacques Peter Terblanche   |
| 29 | Lloyd Barry Acutt          |
| 30 | Jayden Terblanche          |
| 31 | Susanna Magritha Jooste    |
| 32 | Adriaan Roos               |
| 33 | Edward John D'alton        |
| 34 | Hendrik Petrus Goosen      |
| 35 | Jacoba Hendrina Goosen     |
| 36 | David Erasmus Wahlstrand   |
| 37 | Maryrose Morgan            |
| 38 | Percil Struwig             |
| 39 | Anamarie Struwig           |
| 40 | Heinrich Struwig           |
| 41 | Chantelle Venter           |
| 42 | Michelle Oosthuizen        |
| 43 | Michelle Oosthuizen        |
| 44 | Lucas Cornelius Oosthuizen |

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|    |                              |
|----|------------------------------|
| 45 | Christoffel Johannes Van Zyl |
| 46 | Tammy Dawson                 |
| 47 | Alfred Bernard Buis          |
| 48 | Henri Joseph Robert          |
| 49 | Charity Carol Cheptoo Koech  |
| 50 | Maria Eimoa Carelse          |
| 51 | Maike Green                  |
| 52 | Isaac Tan Tze Hua            |
| 53 | Cornelius Du Plessis         |
| 54 | Johannes Zacharias Moolman   |
| 55 | Dianne GlynisMalan           |
| 56 | Ange du Toit                 |
| 57 | Reuben Wentzel               |
| 58 | Leana Shepherd               |
| 59 | Gerhardus Liebenberg         |
| 60 | Christoffel Petrus Mouton    |
| 61 | Jennifer Ann Yuill           |
| 62 | Armand Coetzer               |
| 63 | Louise Coetzer               |
| 64 | Melissa Laubscher            |
| 65 | Daphne Dawn Venter           |
| 66 | Jennifer Honey               |
| 67 | Hans Jorg Wickli             |

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|    |                               |
|----|-------------------------------|
| 68 | Leigh Diane Ravenscroft       |
| 69 | Marco Victor Bonafede         |
| 70 | Candice-Lee Sutton            |
| 71 | Catharina Christina Scheepers |
| 72 | Karen Grobbelaar              |
| 73 | Ludvig Theriault              |
| 74 | Rowan David Fitzgerald        |
| 75 | Joy Ann Ickes                 |
| 76 | Bettie Moolman                |
| 77 | Ludwig Paul Prinsloo          |
| 78 | Mimette Van Niekerk           |
| 79 | Bets Botha                    |
| 80 | John Joseph Barnes            |
| 81 | Juan-Pierre De Breuyn         |
| 82 | Anwar Jose Ziade              |
| 83 | Jason Caruana                 |
| 84 | Mark Arthur Holland Thomas    |
| 85 | Micheal John Walmsley         |
| 86 | Johan Diderich Hattingh       |
| 87 | Malthena Elisa Lebeko         |
| 88 | Rene Susanna Scully           |
| 89 | Annemarie Smuts               |
| 90 | Cornelius Gregorus Dames      |

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|     |                                       |
|-----|---------------------------------------|
| 91  | Anna Maria du Preez                   |
| 92  | Thembi Mildred Nxumalo                |
| 93  | Unine Marais                          |
| 94  | Elizabeth Johanna Petronella Botha    |
| 95  | Jacobus Elbest Grobbelaar             |
| 96  | Hendrina Sophia Grobbelaar Prinsloo   |
| 97  | Celesta Gail Hattingh                 |
| 98  | Raymond Shepherd                      |
| 99  | Jennifer Lee Badenhorst               |
| 100 | Gert Johannes Wentzel                 |
| 101 | Mark Raymond Spratt                   |
| 102 | Rebecca Mapule Motshweni              |
| 103 | Laura Kimberly Estep                  |
| 104 | John Joseph Barnes                    |
| 105 | Simeon Wentzel                        |
| 106 | Elmie Engelbrecht                     |
| 107 | Gary Watson                           |
| 108 | Dorohea Johanna Davel                 |
| 109 | Douw Gerbrand Badenhorst              |
| 110 | Casper Johannes Cornelius Labuschagne |
| 111 | Jenine De Klerk                       |
| 112 | Daminn Rowland                        |
| 113 | Lizbe van den heever                  |

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| 114 | Andrew Paul Ireland                                |
| 115 | Frieda Marlene Snyman                              |
| 116 | Monique Christene Enslin                           |
| 117 | Cornelius Wilhelmus Els                            |
| 118 | Christiaan Ernst Schutte                           |
| 119 | Susanna Maris Sybila Vreken                        |
| 120 | Duncan Rae Stuart Mackie                           |
| 121 | Simone Mackie                                      |
| 122 | Kerry Isabel Joubert                               |
| 123 | Tarmin Aleze Jacobs                                |
| 124 | Nameer Khalaf Hassan                               |
| 125 | Christa Davel - Meiring                            |
| 126 | Qu'ard Meiring (Minor son of Marquard Meiring )    |
| 127 | Theani Meiring (Minr daughter of Marquard Meiring) |
| 128 | Theresa Mouton                                     |
| 129 | Lynette Jilleen Murphy                             |
| 130 | Desiree Adele Kruger                               |
| 131 | Christoffel Petrus Mouton                          |
| 132 | Cindy Lyn Minnie                                   |
| 133 | Johanness Christiaan Frederik Harris               |
| 134 | Heather Jean Scantlebury                           |
| 135 | Isak Petrus Albertus Liebenberg                    |
| 136 | Una Rossouw  |

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|     |                                      |
|-----|--------------------------------------|
| 137 | Theresa Helena van Zyl               |
| 138 | Elsabe Magdalena Wannenburg          |
| 139 | Belinda Wannenburg                   |
| 140 | Antonette Johanna Mynhardt           |
| 141 | Mapule Minah Leeuw                   |
| 142 | Elmari Du Preez                      |
| 143 | Johannes Hendrik Schlebusch          |
| 144 | Gerhardus Jacobus Wannenburg         |
| 145 | Zelda Leeuwner                       |
| 146 | Philippus Johannes Van Der Walt      |
| 147 | Rosemarie Friese                     |
| 148 | Emmerentia Petronella Werner         |
| 149 | Gabriel Dobrovic                     |
| 150 | Genevive Chinedu Orji                |
| 151 | Nicolaas Van Veen                    |
| 152 | Jacobus Engenatuis Bornman           |
| 153 | Louise Kinnear                       |
| 154 | Bilal Moolla                         |
| 155 | Rian Botes                           |
| 156 | Boyd Sikalia(Rochelle Francis Kyser) |
| 157 | Yolandri du Preez                    |
| 158 | Philip Bryan Jennings                |
| 159 | Louisa van Rooyen                    |

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|     |   |
|-----|---|
| 160 | Marquard Meiring                        |
| 161 | Christopher John Olley                  |
| 162 | Alida Johanna Elizabeth du Plessis      |
| 163 | Cormar Films cc                         |
| 164 | Anna Maria Catherine Janse Van Rensburg |
| 165 | Orji Kenneth Chuckwuemeka               |
| 166 | Thabo Andries Serumula                  |
| 167 | Oswald Nadesen                          |
| 168 | Michelle Griesel                        |
| 169 | Kayleen Everelda Booys                  |
| 170 | Susarah Johanna Palvie                  |
| 171 | Mariana du plessis                      |
| 172 | Dimakatso Emley Leburu                  |
| 173 | Yenler Coetzer                          |
| 174 | Jacques Petrov Classen                  |
| 175 | Ethan Pierre Claassen                   |
| 176 | Wendy Raeline Myburgh                   |
| 177 | Ruth Magdalene Stewart                  |
| 178 | Stephen Andrew Moseley                  |
| 179 | Delbert D Ickes                         |
| 180 | Eugene Snyman                           |
| 181 | Wong Foong Yee                          |
| 182 | Michelle Carol Clark                    |

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|     |                                       |
|-----|---------------------------------------|
| 183 | Igor Willi Grobbelaar                 |
| 184 | Gayle Marais                          |
| 185 | Izak Marais                           |
| 186 | Matthew James Bouguenon               |
| 187 | Marthiens Hermanes Van Der Westhuizen |
| 188 | Cheryl Audrey Kruger                  |
| 189 | Cherie Venter                         |
| 190 | Ilze Rontgen                          |
| 191 | Stephina Christina Josina Scott       |
| 192 | Deirdre Charlotte Van Greunen         |
| 193 | Phillipus Potgieter                   |
| 194 | Brenda - LE Murray                    |
| 195 | Magrieta Maria Brits                  |
| 196 | Megan Murray                          |
| 197 | Wilhelm Kruger                        |
| 198 | Hayden Gary Genner                    |
| 199 | Hester Susanna Sophia Lotz            |
| 200 | Nathalie Marguerithe Opperman         |
| 201 | Leon Janse Van Rensburg               |
| 202 | Karen Grobbelaar                      |
| 203 | Cornelius Stephanus Jacobus Bergh     |
| 204 | Petrus Albertus Venter                |
| 205 | Lynda Ann Redman                      |

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|-----|--------------------------------|
| 206 | Alysha Darlene Naidu           |
| 207 | Brenton Reuben Suriah          |
| 208 | Alexandra Scully               |
| 209 | Nazeera Laher                  |
| 210 | Carol Palesa Moripe            |
| 211 | Mona Maria Armine Van Der Walt |
| 212 | Monika Clara Van Niekerk       |
| 213 | Kerina Diamantidis             |
| 214 | Ria Elizabeth Ortmann          |
| 215 | Pieter H Engelbrecht           |
| 216 | Pieter H Engelbrecht           |
| 217 | Hermanus J Engelbrecht         |
| 218 | Phillip Potgieter              |
| 219 | Lukas Ilikola Nantanga         |
| 220 | Agnes Motlaupi Sekele          |
| 221 | Gavin leigh Fynn               |
| 222 | Natasha van den Heever         |
| 223 | Torie Matthew Broad            |
| 224 | Tayla Jade Katzin              |
| 225 | Amy-Lee Katzin                 |
| 226 | Jarrold Vaughn Katzin          |
| 227 | Desiree Naidoo                 |
| 228 | Glyn Terence Boulter           |

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|     |                          |
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| 229 | Sharon Murray            |
| 230 | Chase Craig Benson       |
| 231 | Andrew Hammond           |
| 232 | Jordan Hammond           |
| 233 | Lynette Van Der Merwe    |
| 234 | Samuel Fulton            |
| 235 | Lily - Jo Sabatier Sloan |
| 236 | Neil Robert Murray       |
| 237 | Dean Wayne Benson        |
| 238 | Aurora Patricia Sloan    |
| 239 | Eric Laynes              |
| 240 | Mark James Sloan         |
| 241 | Festus David             |
| 242 | Beckie Violet Laynes     |
| 243 | Claire Catherine Grist   |
| 244 | Heloise Labuschagne      |
| 245 | Agnes Jean Goodman Sloan |
| 246 | Joanne Mandy Sabatier    |
| 247 | Stephen Gordan Sloan     |
| 248 | Kelsey Hannah Sloan      |
| 249 | Ryan Tiberius Sloan      |
| 250 | Susan Jane Sloan         |
| 251 | Robyn Kelsey Sloan       |

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|     |                             |
|-----|-----------------------------|
| 252 | Sybil Dawn Wood             |
| 253 | Gail Sukop                  |
| 254 | Linsey Dyer                 |
| 255 | Lilian Wavinya Musyoka      |
| 256 | Eadi Smit                   |
| 257 | SEN-TRANS (PTY) LTD         |
| 258 | Daniel Abraham Smit Senekal |
| 259 | Carlson Ifughe              |
| 260 | Lydia Van Zyl               |
| 261 | Carle Van Zyl               |
| 262 | Jana Van Zyl                |
| 263 | Nico Jutrus Van Zyly        |
| 264 | Riaan Pieter Van Zyl        |
| 265 | Mohammad Zia Ismail         |
| 266 | James Nerney                |
| 267 | Belinda Bernice Spannebuerg |
| 268 | James Vang                  |
| 269 | Maria Camila Vargas Munos   |
| 270 | Maria Isabel Ruiz Caro      |
| 271 | Mariela Vargas Garzon       |
| 272 | Hernando Vargas Garzon      |
| 273 | Jeffrey Frank Wilken        |
| 274 | Linda Marianne Van Niekerk  |

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|     |                                |
|-----|--------------------------------|
| 275 | Barend Phillipus Van Niekerk   |
| 276 | Petro Adriana Kruger           |
| 277 | Pieter CJ Knoetze              |
| 278 | Michelle knoetze               |
| 279 | Alida Maria Knoetze            |
| 280 | Nqobile S.J Mabane             |
| 281 | Leshilo Mapunye Jacob          |
| 282 | Nomusa Joyce Sikosana          |
| 283 | Monica Moua                    |
| 284 | Fisher Moua                    |
| 285 | Belinda Moua                   |
| 286 | Cheryl Schlebusch              |
| 287 | Mohlathego Lucas Madibana      |
| 288 | Mmatlou Elsie Nkoana           |
| 289 | E Engelbrecht                  |
| 290 | A Engelbrecht                  |
| 291 | Zirkia Jacoba Fourie           |
| 292 | Lisl Claire Uytenbogaedt       |
| 293 | Petrus Johannes koortzen       |
| 294 | Francois Johannes Roux         |
| 295 | Hendrina Magdalene Luwe-Hoberg |
| 296 | Gerhard Rudolf Hoberg          |
| 297 | Johannes Arjan Werkman         |

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|     |                                 |
|-----|---------------------------------|
| 298 | Jillian Marilyn Morris          |
| 299 | Hendrika Elsa Roux              |
| 300 | Darwin Thimmadu                 |
| 301 | Vernette Roberts                |
| 302 | Magdeline Salome Ishah Hattingh |
| 303 | Hasan Chireka Chikomora         |
| 304 | Maria Johannes Roos             |
| 305 | Richard Chad Smout              |
| 306 | Richard Theodore Smout          |
| 307 | Merle Iris Smout                |
| 308 | Cindy Coetzee                   |
| 309 | Louis Jacobus Cierenberg        |
| 310 | Paul Deon De Villiers           |
| 311 | Sharon-lee De Villiers          |
| 312 | Adam Adriaan van Niekerk        |
| 313 | Ryan Carlson                    |
| 314 | Craig Stephen Osborne           |
| 315 | Henning Petrus Viljoen          |
| 316 | Ian Neil Vlaming                |
| 317 | Pieter Badenhorst Senekal       |
| 318 | Cindy Rondel                    |
| 319 | Annen Maria Roux                |
| 320 | Susanna Helena Maria Kleyn      |

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|     |                                     |
|-----|-------------------------------------|
| 321 | Rachel Aletta Van Der Merwe         |
| 322 | Willem Hendri Van Der Merwe         |
| 323 | Tanya Farah                         |
| 324 | Brenda de Jager                     |
| 325 | Emile Hendrik Schoeman              |
| 326 | Caraleigh Carter                    |
| 327 | Sybrand Jacobus Johannes Van Sitter |
| 328 | Johannes Andreas De Necker          |
| 329 | Berna Hermien Groenewald            |
| 330 | Darren Margo                        |
| 331 | Shaun Lamprecht                     |
| 332 | Tan Wee Liang                       |
| 333 | Juanita Le Grange                   |
| 334 | Gerhard Kern                        |
| 335 | Johannna Francina Hamman            |
| 336 | Rasita Ejupovic                     |
| 337 | Daniel Frederieck Ratief            |
| 338 | Pulane Beulah Mhlongo               |
| 339 | Shelton Mollentze                   |
| 340 | Ranier Zietsman                     |
| 341 | Taine Hilton Hartzenberg            |
| 342 | Hilton Clifford Hartzenberg         |
| 343 | Laetitia Hartzenberg                |

Fider Nk



|     |                                 |
|-----|---------------------------------|
| 344 | Liesl A Rascon                  |
| 345 | Manuel Delgado Bertuchi         |
| 346 | Dawid Herculeus Marais          |
| 347 | Jacqueline Marais               |
| 348 | Anna Coertzen                   |
| 349 | Roelof Coertzen                 |
| 350 | Roelof JJ Coertzen              |
| 351 | Roelien Coertzen                |
| 352 | Roelde Coertzen                 |
| 353 | Trevor Jacob Adams              |
| 354 | Stephen John Myburgh            |
| 355 | Luke Adamson                    |
| 356 | Bradley Smith (Elisley Pty Ltd) |
| 357 | Nico Jansen van Vuuren          |
| 358 | Natasha Jansen van Vuuren       |
| 359 | Julie Dudley                    |
| 360 | Stella Grobler                  |
| 361 | Deon Terblanche                 |
| 362 | Bernard Van Tonder              |
| 363 | Zander Van Tonder               |
| 364 | Barend Jacobus Terblanche       |
| 365 | Ellen Van Heerden               |
| 366 | Karin Terblanche                |

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|     |                          |
|-----|--------------------------|
| 367 | Albertus Johannes Fourie |
| 368 | Suetta Groenewald        |
| 369 | Anna Nbamonako Nangolo   |
| 370 | Talita Botha             |
| 371 | Pieter Dito              |
| 372 | Khaalid Van Greunen      |
| 373 | Morne Van Greunen        |
| 374 | Leonard van Greunen      |
| 375 | Anne-Marie Van Greunen   |
| 376 | Juanita Strydom          |
| 377 | John H Fernandez         |
| 378 | Morney Tristen Ruth      |
| 379 | Kuno De Bree             |
| 380 | Victor Calvert           |
| 381 | Susan Whatton            |
| 382 | Richelle Daniel Mostert  |
| 383 | Sebastian Heyns          |
| 384 | Suzanne-Louise Heyns     |
| 385 | Benjamin Andre Heyns     |
| 386 | Susan Cartwright         |
| 387 | Christian Cronje         |
| 388 | Johan Heine              |
| 389 | Lizane Heine             |

F. de N

|     |   |
|-----|---|
| 390 | Lizette Heine   |
| 391 | Francois Van Wyk  |
| 392 | Donovan Ruiters   |
| 393 | Wayne Leonard Meyer   |
| 394 | Karen Elizabeth Fourie                                      |
| 395 | Johannes Jurgens Green                                      |
| 396 | Onsens Saechao  |
| 397 | Sandra Vanessa Baneke                                       |
| 398 | Sonja Gisela Rauner ( t/a Purple Fig Properties)            |
| 399 | Duane Russell Norland                                       |
| 400 | Jacobus Johannes Liebenberg                                 |
| 401 | Pauline Louise Greef  |
| 402 | Diana Althea Beningfield                                    |
| 403 | Ricardo Alberto De Bonis                                    |
| 404 | Leandro De Bonis (Monor Child of Ricardo Alberto De Bonis)  |
| 405 | Gabriela De Bonis (Minor Child of Ricardo Alberto De Bonis) |
| 406 | June Kriel  |
| 407 | Arne Nicolaas Lewis   |
| 408 | John Miliias  |
| 409 | Marinda Miliias   |
| 410 | Mohammed M Moosa  |
| 411 | Petrus Jacobus Lourens Bierman                              |
| 412 | Susanna Elizabeth Bierman                                   |

Fig. 11

|     |                             |
|-----|-----------------------------|
| 413 | Schalk Burger               |
| 414 | Isabella Gerlach            |
| 415 | Christo Human               |
| 416 | Maria Aletta Human          |
| 417 | Debt Right (Christo Humane) |
| 418 | Dirk Donathan Human         |
| 419 | Human Business Management   |
| 420 | Andrew Grant                |
| 421 | Barend Vorster              |
| 422 | Christine Charlotte Poynton |
| 423 | Laura Dolgner               |
| 424 | Happiness Nkonzo            |
| 425 | Luyolo ndyawwe (minor )     |
| 426 | Cheyenne De Beer            |
| 427 | Sibusiso Gigi               |
| 428 | Ranjana Malaika Samira Gigi |
| 429 | Khawula Moses Mafa          |
| 430 | Mmatau Margaret Moloji      |
| 431 | Fritz Koelliker             |
| 432 | Lorraine Van Zyl            |
| 433 | Sonnet Becker               |
| 434 | Iris Strydom                |
| 435 | Arthur John Millar          |

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|     |                                  |
|-----|----------------------------------|
| 436 | Duncan Du Plessis                |
| 437 | Hubertus Cornelis Immens         |
| 438 | Mieke Coetzee                    |
| 439 | Judith-Anne Van den Berg         |
| 440 | Judith-Anne Coetzee              |
| 441 | Matthys Christoffel Van Den Berg |
| 442 | Timothy Coetzee                  |
| 443 | Hans Jacob Human                 |
| 444 | Barbara Beatrix Kolliker         |
| 445 | Celine Nerina Kolliker           |
| 446 | Katharina Ursula Frommherz       |
| 447 | Monika Visintin                  |
| 448 | Marc Alphonse Perdrizat          |
| 449 | Martin Weber                     |
| 450 | Hax Frommherz                    |
| 451 | Ursula Hess                      |
| 452 | Barbara Schneides                |
| 453 | Maja Narkwaldes                  |
| 454 | Roland Bruggmann                 |
| 455 | Yvette Rechsteiner               |
| 456 | Edith Scherrer                   |
| 457 | Claudia Leisebach                |
| 458 | Ruth Schum                       |

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|     |                             |
|-----|-----------------------------|
| 459 | Monika Dieser               |
| 460 | Josef Alfons Schildknecht   |
| 461 | Hyita Gemperle              |
| 462 | Leonel Alejandro Cajax      |
| 463 | Andrea Tanja Zumsteg        |
| 464 | Daniel Bruhwiler            |
| 465 | Patrick Zumsteg             |
| 466 | Elvira Margrit Etter        |
| 467 | Corinne Hess                |
| 468 | Marcia Perdrizat            |
| 469 | Thomas Kolliker             |
| 470 | Mike Christian Markwalder   |
| 471 | Roland Kaufmann             |
| 472 | Roland Gemperle             |
| 473 | Eveline Bruggmann           |
| 474 | Daniela Schweizer           |
| 475 | Desere Anita-London Muller  |
| 476 | Juan Alexandra Muller       |
| 477 | Mariana Smit                |
| 478 | Amal Khanna                 |
| 479 | Andries Johannes Rautenbach |
| 480 | Ruan Philippus Ferreira     |
| 481 | Petrus Johannes Van Biljon  |

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|     |   |
|-----|---|
| 482 | Elizabeth Cornelia van Biljon                         |
| 483 | Yoricq Quinn Vivaliano                                |
| 484 | CW Van Der Merwe                                      |
| 485 | K Van Der Merwe                                       |
| 486 | Sanet Van Der Merwe                                   |
| 487 | Roney P Nieuwenweyzen                                 |
| 488 | Annalize Van Der Walt-Boonzaaier                      |
| 489 | Jakob de Graaff Genis                                 |
| 490 | Gary Albertus Jacobs                                  |
| 491 | PaperPapercake Trading 112cc (christo human)          |
| 492 | Christo Human (Junior)                                |
| 493 | Elizabeth Gertruida Human                             |
| 494 | Anna Dorothea Brand                                   |
| 495 | Shane Johnson   |
| 496 | Patricia Caroline Van Den Heever                      |
| 497 | Ilze De Klerk   |
| 498 | Kgomotso Ursula Mogashoa                              |
| 499 | Erika Anna Peter-Muster                               |
| 500 | Wilhelm Straessle                                     |
| 501 | Michael Ernst Peter                                   |
| 502 | Markus Andreas Peter                                  |
| 503 | Sommer Sonja (Minor Child of Erika Anna Peter-Muster) |
| 504 | Uys Johanna Visser                                    |

F. de J. N.

|     |  |
|-----|--|
| 505 | Alida Maria De Jager   |
| 506 | Jacobus Marthinus De Jager   |
| 507 | Moriska Brits  |
| 508 | Kevin Brits  |
| 509 | Nadine Swanepoel   |
| 510 | Eliora Swanepoel   |
| 511 | Sanet Kotze  |
| 512 | Maryke Van Rensburg  |
| 513 | Rachel Maria Roux  |
| 514 | Paulus Adamus Roux   |
| 515 | Nwamisaveni Maria Sono-Nkoana  |
| 516 | Grant-Pierre Van Wyk   |
| 517 | Willem Jacobus Louwrens Roux   |
| 518 | Jan Jonathan Stephenus De Klerk                                      |
| 519 | Warren Brand Maritz  |
| 520 | Vicky M (deceased;Upline Agent =Marissa van Wyk(ID:520101 0027 083 ) |
| 521 | Jacobsbaai Kontrei Eiendomme   |
| 522 | Marissa Van Wyk  |
| 523 | Melchior Jacobus Klopper   |
| 524 | Pierre Hugo  |
| 525 | Bruce Scott Marfadyen  |
| 526 | Deon Coates  |
| 527 | Stevelena Richard Coates   |

F. de J. M.A.



|     |                            |
|-----|----------------------------|
| 528 | Catherina Gertrude Snyman  |
| 529 | Maria Magdalena Smith      |
| 530 | Ruby Charles               |
| 531 | Diana Helen Collier        |
| 532 | Karim Hanna                |
| 533 | Albert Bossart             |
| 534 | Sabrina Jasmin Bossart     |
| 535 | Simone David Bossart       |
| 536 | Christian Andreas Bossart  |
| 537 | Barend Christiaan Claassen |
| 538 | Frans Jacobus Eloff        |
| 539 | Estelle Eloff              |
| 540 | Rita Kaufmann              |
| 541 | Stanley Thompson           |
| 542 | Deanne Thompson            |
| 543 | Thamsanqa Thomas Mpahlwa   |
| 544 | Adriaan Callow             |
| 545 | Monique Grobbelaar         |
| 546 | Tania-lee Van Wyk          |
| 547 | Mitzi Duvenhage            |
| 548 | Charne Moffat              |
| 549 | Willem Petrus Arnoldi      |
| 550 | Louisa Ilanna Arnoldi      |

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|     |                                       |
|-----|---------------------------------------|
| 551 | Elizabeth Frances Duvenage            |
| 552 | Francois Jakobus Joubert              |
| 553 | Gideon Petrus Kriel                   |
| 554 | Eva Mangubat                          |
| 555 | Aletta Johanna Bornman                |
| 556 | Christopher Arthur Jacob              |
| 557 | Russell James Jacob                   |
| 558 | Luke James Jacob                      |
| 559 | Jan Hendrik Mare                      |
| 560 | Wilhelmina Anna Coetzee               |
| 561 | Claire Dunn                           |
| 562 | Adriaan Wessel Pieterse               |
| 563 | Renette Kruger                        |
| 564 | Stephanus Rudolph Jansen Van Vuuren   |
| 565 | Vinant Simon Ferreira                 |
| 566 | Felicia Venancio Nhandime             |
| 567 | Ndukwu George Chibuzor                |
| 568 | Peter William Lambert                 |
| 569 | James Haines                          |
| 570 | Gertruida Elizabeth Jansen Van Vuuren |
| 571 | Andre Zoar Sorger                     |
| 572 | Andre Hennie Scriven                  |
| 573 | Toby Harris                           |

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|     |                                  |
|-----|----------------------------------|
| 574 | Istvan Galbacs                   |
| 575 | Frank Dunn                       |
| 576 | Petrus Johannes Van Schalkwyk    |
| 577 | Jacques du Plessis               |
| 578 | Christiaan Vorster Geldenhuys    |
| 579 | Nikita Stanley                   |
| 580 | Samantha Toni Hendreck           |
| 581 | Liesl Viljoen                    |
| 582 | Carolina Maria Petronella Theron |
| 583 | Roelof Hulscher                  |
| 584 | Aletta Gertruida Eloff           |
| 585 | Pieter Eloff                     |
| 586 | Aletta Gertruida Eloff           |
| 587 | Annabel Bovey                    |
| 588 | Janus Bovey                      |
| 589 | Robin Owen Barnes                |
| 590 | Dewan Van Heerden                |
| 591 | Juan Van Heerden                 |
| 592 | Rachelle Van Heerden             |
| 593 | Matthys Jacobus du Toit          |
| 594 | Nicole Vasti du Toit             |
| 595 | Elnette Anzuelle du Toit         |
| 596 | Pareo Pantaleo                   |

Fdeg - 11

|     |                               |
|-----|-------------------------------|
| 597 | Patrick Riverdale Millerd     |
| 598 | Maria Susanna Viljoen         |
| 599 | Aletta Maria Elizabeth Mengel |
| 600 | Brenda Geraldine Coleman      |
| 601 | Gregory Craig Smith           |
| 602 | Jennifer Honey                |
| 603 | Jozua Joubert                 |
| 604 | Pierre Lotter                 |
| 605 | Daniel Lotter                 |
| 606 | Reuben Lotter                 |
| 607 | Natasja Lotter                |
| 608 | Susanna Christina Jooste      |
| 609 | Catharina Elizabeth Lotter    |
| 610 | Lynette Catherine Nel         |
| 611 | Willlem Hendrik le Roux       |
| 612 | Len Derrick Nel               |
| 613 | Deirdre Van Der Merwe         |
| 614 | Ronald Botes                  |
| 615 | Erica Van Der Merwe           |
| 616 | Loghan Stals                  |
| 617 | Anari du Plessis-Stals        |
| 618 | Colette Kruger                |
| 619 | Ruben Lourens Kruger          |

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|     |                                 |
|-----|---------------------------------|
| 620 | Lynn Ethel Finger               |
| 621 | Pieter Willem Andriaan Kruger   |
| 622 | Gerrit Cornelis du Preez        |
| 623 | Joyce Adriana Griffin           |
| 624 | Vaughan Warder Griffin          |
| 625 | Agnes Kesentseng Diphoko        |
| 626 | Joseph William Wolmarans        |
| 627 | Jacob Nel                       |
| 628 | Elsie Johanna Van Staden        |
| 629 | Ringson Ngozo                   |
| 630 | Johannes Cornelius Botha        |
| 631 | Gerhardt Arnold Hattingh        |
| 632 | Jenine De Klerk                 |
| 633 | Reuben de Klerk                 |
| 634 | Amelia de Klerk                 |
| 635 | Rozane Wentzel                  |
| 636 | Elize Lee                       |
| 637 | Daniel J Rawson                 |
| 638 | Elmare Pieters                  |
| 639 | Franscois Pieters               |
| 640 | Franscois Alwyn Pieters         |
| 641 | Debbie Crous                    |
| 642 | Dicky Geertruida Jacob da Serra |

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|     |  |
|-----|--|
| 643 | Barry Kingsley Nell                    |
| 644 | Johanna Lerm                           |
| 645 | Troy Aaron Griffin                     |
| 646 | Brody James Griffin                    |
| 647 | Sharon Denise Murphy                   |
| 648 | Daniel Johannes Opperman               |
| 649 | Hermie Franciena Grobbelaar            |
| 650 | Michael John William                   |
| 651 | Anna O'Connel                          |
| 652 | James Jackson O'Connel                 |
| 653 | Morne Walker                           |
| 654 | Leticia Charles                        |
| 655 | Annah Charles                          |
| 656 | Edward Samuel Bhana                    |
| 657 | Masterkraft Home Interiors             |
| 658 | Aditha Rhugbeer                        |
| 659 | Riaan La Cock                          |
| 660 | Pamela Alice Riley                     |
| 661 | Natalija Cerimaj                       |
| 662 | Omer Cerimaj                           |
| 663 | Agata Cerimaj                          |
| 664 | Michael John Chapman                   |
| 665 | Carla Marina Alves De Freitas Dobrovic |

Fides

|     |  |
|-----|--|
| 666 | Jorge Antonio Dobrovic                         |
| 667 | Stefan Edward Dobrovic                         |
| 668 | Nikola Grubisic                                |
| 669 | Tjaart Nicolaas Grobbelaar                     |
| 670 | Christopher James Allen                        |
| 671 | Mogamat Gesant Plaatjes                        |
| 672 | Shadin Thompson                                |
| 673 | Kandy Theodora Grieve                          |
| 674 | Elaine Zinn                                    |
| 675 | Lorraine Van Loggerenberg                      |
| 676 | Clark Edsel G Bading                           |
| 677 | Ziglinde de Jager                              |
| 678 | Roger Bernard Wilson Mcloughlin                |
| 679 | Lane Duvenage                                  |
| 680 | Hendrina Wilhelmina Duvenage                   |
| 681 | Johannes Jacob Duvenage                        |
| 682 | Johannes Jacob Duvenage(LaEugenious(Pty) Ltd ) |
| 683 | Isobel van der Merwe                           |
| 684 | Andrea Bavaro                                  |
| 685 | Johanna Elizabeth Mare                         |
| 686 | Christoffel Adriaan Visser                     |
| 687 | Eugene Loftus                                  |
| 688 | Jacob Mynhardt Loubser                         |

Fide . NH

|     |                               |
|-----|-------------------------------|
| 689 | Jan Johannes Petrus Joubert   |
| 690 | Michael Ian Silberman         |
| 691 | Jean Anita Plaatjes           |
| 692 | Rumelia Van Wyk               |
| 693 | Denzil Henry Gunning          |
| 694 | Christiaan Hendrik du Plessis |
| 695 | Renette Mouton                |
| 696 | Marita Keet-Kotze             |
| 697 | Alexander Kotze               |
| 698 | Esther Mare                   |
| 699 | Lourens Abraham Kotze         |
| 700 | Caitlin Amber Yates           |
| 701 | Michele Perch                 |
| 702 | Brandon David Yates           |
| 703 | Andre Terblanche              |
| 704 | Muriel Jones                  |
| 705 | Glyn Dawne Bame               |
| 706 | Emiel Nel                     |
| 707 | Carol Anne Denise Baird       |
| 708 | Peter Ekhoﬀ                   |
| 709 | Nikashni Gajoo                |
| 710 | Bernadette Sophia October     |
| 711 | Carel Frederik Kirstein Greef |

Fida. NH



|     |   |
|-----|---|
| 712 | Anna-Marie de Villiers                  |
| 713 | Johannes Hendrik Verhoef                |
| 714 | Coen Vervoort                           |
| 715 | Clive Robert Cross                      |
| 716 | Antonette Loots                         |
| 717 | Carol Patricia Hendry                   |
| 718 | Jakobus Paulus Daniel Ellis             |
| 719 | Barend J Van Den Berg                   |
| 720 | Engrid Herna Margaretha Van Coppenhagen |
| 721 | Heinrich Britz                          |
| 722 | Annelise Susana Naude                   |
| 723 | Chere Vincent Collins Motaung           |
| 724 | Lyle Craig Pascoe                       |
| 725 | Ilse van Niekerk                        |
| 726 | Eventech CC                             |
| 727 | Anita louise potgieter                  |
| 728 | Gerrit Stefanus Johannes burger         |
| 729 | Hercules Petrus Jacobus du Toit         |
| 730 | Astrid Erene Schwarz                    |
| 731 | Kathleen Dorothy Hall                   |
| 732 | Jacobus andries Jooste                  |
| 733 | Luwanda Kirsten Pilay                   |
| 734 | Koseelan Pillay                         |

  
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|     |                                     |
|-----|-------------------------------------|
| 735 | Gideon Krige Slabber                |
| 736 | Denise Seguin                       |
| 737 | Diane Mercure                       |
| 738 | Dehan Miller                        |
| 739 | Anneline Miller                     |
| 740 | Louise Miller                       |
| 741 | Chantel Miller                      |
| 742 | Jan Albertus Viljoen Miller         |
| 743 | Coenraad Engelbrecht                |
| 744 | Elmie Engelbrecht                   |
| 745 | Abel Jacobus J.V Rensburg           |
| 746 | Adel Fasen                          |
| 747 | ES Jansen Van Rensburg              |
| 748 | Jaco JV Rensburg                    |
| 749 | Rayno Marius Ferreira               |
| 750 | Benedict Christopher Searle Shelley |
| 751 | Lucy Josephine Searle Shelley       |
| 752 | Joanne Wendy Shelley Searle         |
| 753 | Lizane Heine                        |
| 754 | Johan Heine                         |
| 755 | Ruzane Beeslaar                     |
| 756 | Eureka Wiehahn                      |
| 757 | Ema Rabe                            |

Eden

|     |                                   |
|-----|-----------------------------------|
| 758 | Nadia Rabe                        |
| 759 | Arno George Rabe                  |
| 760 | Reinette Estelle Van Der Merwe    |
| 761 | Hendrik Christoffel Van Der Merwe |
| 762 | Justice Dikgetho Direko           |
| 763 | Sehularo Tisetso John Direko      |
| 764 | Nosipho Dinah Makhakolo           |
| 765 | Hannes Pieter Van Der Merwe       |
| 766 | Helene Rene Van Der Merwe         |
| 767 | Elsie Sophia Jansen Van Rensburg  |
| 768 | Benedict Christopher Shelley      |
| 769 | Joanna Wendy Searle               |
| 770 | Lucy Josephine Searle Shelley     |
| 771 | Nicola Erika Weber                |
| 772 | Caitlin Leigh Hartzenberg         |
| 773 | Pierre Rene Weber                 |
| 774 | David Meyer                       |
| 775 | Lene Tempelhoff                   |
| 776 | Johanna Maria (Joan) Tempelhoff   |
| 777 | Lawrence Johanna Tempelhoff       |
| 778 | Imogen Van Dyke                   |
| 779 | Louis Francois Le Grange          |
| 780 | Jan Abraham Theron                |

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|     |   |
|-----|---|
| 781 | Batat Elisha Hosla Nya'akuna              |
| 782 | Christoffel Niehaus                       |
| 783 | Dineo Tshabalala                          |
| 784 | Shaen Helen Adey                          |
| 785 | Jane Amelia Mayne                         |
| 786 | Benita Botha                              |
| 787 | Alaia Botha (Minor Child of Benita Botha) |
| 788 | Andries Johannes Last                     |
| 789 | Cornelius Daffie                          |
| 790 | Rune Uys                                  |
| 791 | Rosa Hermina Maria Uys                    |
| 792 | Johny Francois Uys                        |
| 793 | Amanda Johanna Podge                      |
| 794 | Francois Jacobus Joubert                  |
| 795 | Surina Joubert                            |
| 796 | Charne Joubert                            |
| 797 | Aldrich Francois Joubert                  |
| 798 | Susanna Hermina van Heerden               |
| 799 | Helany Carlo Rossouw                      |
| 800 | Rowan Naicker                             |
| 801 | Moganathan Perumal Naicker                |
| 802 | Elizabeth Johanna Viljoen                 |
| 803 | Vesna Cukovic                             |

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|     |   |
|-----|---|
| 804 | Martha Bernece van Molendorff                   |
| 805 | Anette Hilda Oelofse                            |
| 806 | Hilda Annette De Beer                           |
| 807 | Joey Swart                                      |
| 808 | Vasti Ester Spiller                             |
| 809 | Pieter Jacobus kruger                           |
| 810 | Hanna Abigail Spiller                           |
| 811 | Carla Maria Spiller                             |
| 812 | Ester Maria Spiller                             |
| 813 | Zander Coetzee                                  |
| 814 | Stian Coetzee                                   |
| 815 | Hercules Christiaan Coetzee (Cadascape 1887285) |
| 816 | Theodoris Johannes Kruger                       |
| 817 | Joane Antoenette Kruger                         |
| 818 | Albertus Johannes Kruger                        |
| 819 | Hercules Christiaan Coetzee (Cadascape 1562670) |
| 820 | Andries Johannes Brits                          |
| 821 | Anel Theunissen                                 |
| 822 | Jurg Van Der Westhuizen                         |
| 823 | Ulrike Wickli                                   |
| 824 | Hans Jorg Wickli                                |
| 825 | Lee-Anne Chazen                                 |
| 826 | Leon Arthur Holmes                              |

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|     |  |
|-----|--|
| 827 | Elizabeth Anne Holmes                          |
| 828 | Sandra louise Botha                            |
| 829 | Eugene Botha                                   |
| 830 | Carol Ann Millered (User ID:94044996)          |
| 831 | Carol Ann Millered (User ID:80112713)          |
| 832 | Hendrina Sophia Venter                         |
| 833 | Cecilia Maria Louisa Venter                    |
| 834 | Eugene Christo Marais                          |
| 835 | Annamarie Snyman                               |
| 836 | Willem Johannes Snyman                         |
| 837 | Jakomina Maria Swart                           |
| 838 | Pieter Jakobus Swart                           |
| 839 | ChrisJan De Wet Rebel                          |
| 840 | Jan Jonathan Swart                             |
| 841 | Lourens Petrus Swart                           |
| 842 | Jonathan Johannes Rebel                        |
| 843 | Hester Catharina Rebel                         |
| 844 | Glandy Patricia Mercia Everson                 |
| 845 | Joseph Rudolf Stephen Cupido                   |
| 846 | Judith Patricia Bartels                        |
| 847 | Armin Heinz Bartels                            |
| 848 | Judith Patricia Bartels(odetteborger 54964625) |
| 849 | Judith Patricia Bartels(colleenborger68920462) |

*F. de . M.*

|     |  |
|-----|--|
| 850 | Judith Patricia Bartels(phillipboger53587808)    |
| 851 | Judith Patricia Bartels(jessicabartels887477588) |
| 852 | Judith Patricia Bartels(AJBUS54964625)           |
| 853 | Daron Falkson                                    |
| 854 | Dickson Nyamushure                               |
| 855 | Barbara Andreas Williams                         |
| 856 | Linda Alice Cameron-Dow                          |
| 857 | Pieter Steenberg                                 |
| 858 | Carol Brabant                                    |
| 859 | Erna Amora Liebenberg                            |
| 860 | Michael Joh Williams                             |
| 861 | Johan Brand                                      |
| 862 | Erika Armstrong                                  |
| 863 | Nicola Zenobia Van Wyk                           |
| 864 | Giano Zelvano Van Wyk                            |
| 865 | Wilhemina Susanna Van Wyk                        |
| 866 | Johannes Nicolas Van Wyk                         |
| 867 | Brian Leary                                      |
| 868 | Rose Johnson-Williams                            |
| 869 | Cherry Coustas                                   |
| 870 | Chante Liebenberg                                |
| 871 | Susanna Liebenberg                               |
| 872 | Johan Liebenberg                                 |

*L. J. J. N.*

|     |                           |
|-----|---------------------------|
| 873 | Annatjie Liebenberg       |
| 874 | Schalk Liebenberg         |
| 875 | Hetta Pansegrouw          |
| 876 | Jannie Pansegrouw         |
| 877 | Johan Francois Oosthuizen |
|     |                           |

F. de J.



"EDJ3"

# Mandate

## Particulars of Client (Member of MTI)

Full Name: CECIL JOHN JACOB ROWE

Identity/Registration Nr: 5112255050088

Care-taker / Guardian / Proxy Representative Name: \_\_\_\_\_

Care-taker / Guardian / Proxy Representative Identity Nr: \_\_\_\_\_

I, CECIL JOHN JACOB ROWE

as a **Member of MTI**, or in my capacity on behalf of the **Member of MTI** mentioned above,

- A.** do hereby **nominate and appoint ELNA DE JAGER** from **EDJ ATTORNEYS INC.** situated at **71 McHardy Avenue, Brandwag, Bloemfontein** to assist me in my MTI Bitcoin Recovery matter. (I further understand there will be no costs to me regarding this service and these costs will be covered by the MTI Members Justice Group represented by Cecil John Jacob Rowe and its funders).
- B.** do hereby **revoke any and all previous mandates** afforded to **all other parties/nominees other than ELNA DE JAGER** dated **before the date of this document.**
- C.** hereby also confirm that I am indeed aware that **Mrs. Elna De Jager is not situated in Cape Town** and she subsequently has to appoint a **correspondent attorney to act on her behalf**, and I hereby also confirm that I accept she will make use of the services of a law firm situated in **Cape Town** by the name of **HEYNS ATTORNEYS.**
- D.** hereby authorise **ELNA DE JAGER** from **EDJ ATTORNETS INC.** to take all necessary steps to gain exclusive control over all applicable Hardware Devices such as the MTI Server, Hardware Wallets, Laptops, Computer Equipment, External Hard Disk Drives, External Memory Sticks, and Wallet Addresses with applicable access details, and the like to protect my Personal Information and Crypto Assets, and to protect my interests in terms of the **Protection of Personal Information (POPI) Act of 2013** and for whatever other reason which may materialise in the future.

Signed at VALHALLA on this 1st day of NOVEMBER 2021


  
\_\_\_\_\_  
Signed by:

\_\_\_\_\_  
Acceptance by Firm: E de Jager

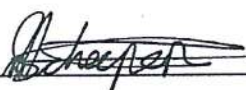
In my capacity as the a Guardian / Care-taker / Representative the following Family Relative or Friend;

Client Name: \_\_\_\_\_

### Witnesses

1. 

1. \_\_\_\_\_

2. 

2. \_\_\_\_\_



EDJ 4

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

CHARL COETZEE

Do hereby make oath and say that:

1. I am an adult male with identity number 8304155168089 and residing at 8 Palm Crescent ,Natures Valley,260 Silikats Causeway Faerie Glen,Pretoria.
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.

Handwritten signatures and initials, including a large signature on the left, a signature 'Booyen' in the middle, and initials 'F de J' on the right.

3. I confirm that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me.

4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
DEPONENT

Sworn to and signed in my presence at Pretoria on this 25 day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
COMMISSIONER OF OATHS

ANDRIES JOHANNES DE JAGER  
COMMISSIONER OF OATHS  
CHARTERED ACCOUNTANT (SA)  
P.O. BOX 100865 . BRANDHOF. 9324  
71 Mc HARDY STRAAT  
BLOEMFONTEIN  
TEL + 051 410 4260 - FAKS: 051 444 0069  
andre@djenkie.co.za





EOJ 5"

IN THE HIGH COURT OF SOUTH AFRICA

WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,<br/>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

SAMANTHA BLUME

Do hereby make oath and say that:

1. I am an adult female with identity number 8105270094088 and residing at Plot 50 Lochner Road ; Mmendi AH x1 ; 0149
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.




3. I confirm that I am a Class 1 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 1 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
DEPONENT

Sworn to and signed in my presence at Centurion on this 25 day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
COMMISSIONER OF OATHS  
NADINE SUSAN LOMBARD  
COMMISSIONER OF OATHS/KOMMISSARS VAN EDE  
Practising Attorney/Prakiserende Prokureur R.S.A.  
9 LAURISTON PLACE  
GLEN LAURISTON  
P.O BOX 1117 • PRETORIA • 0001

*Elna de Jager*

EDJ 6"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

---

CONFIRMATORY AFFIDAVIT


---

I, the undersigned

CORNELI GROBLER

Do hereby make oath and say that:

1. I am an adult female with identity number 810505 0377085 and residing at 13 VILLA MARELLE, NICATOR STR, ROOIHUISKRAAL NORTH
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.



3. I confirm that I am a Class 1 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 1 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
 \_\_\_\_\_  
**DEPONENT**

Sworn to and signed in my presence at CENTURION on this 25 day of NOVEMBER 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
 \_\_\_\_\_  
**COMMISSIONER OF OATHS**

| Commissioner of Oaths  |   |
|--|---|
| Name   | : R. TALJAARD   |
| Rank   | : CAPTAIN EX OFFICIO (SANDF)  |
| Number   | : 85408102PE  |
| Signature  | :  |
| Date   | : 25/11/2022  |
| I hereby certify that this is a true and correct copy of the original document which has been presented to me. |   |
| I certify that according to my observations no alterations have been made to either the original or the copy.  |   |

*E. de Jager*

" E0J 7 "

IN THE HIGH COURT OF SOUTH AFRICA

WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,<br/>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

HENRY ROBERT JENKINS

Do hereby make oath and say that:

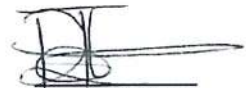
1. I am an adult male with identity number 771110 5028 083 and residing at 50 LOCHNER ROAD, MNANDI CENTURION
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.



Handwritten signature of Henry Robert Jenkins, including a large initial 'H' and the name 'Henry Robert Jenkins' written in cursive.



3. I confirm that I am a Class 1 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 1 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

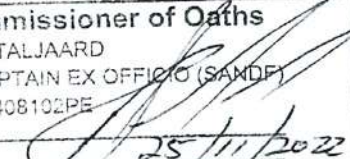
  
DEPONENT

Sworn to and signed in my presence at Centurion on this 25 day of NOVEMBER 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
COMMISSIONER OF OATHS

| Commissioner of Oaths  |   |
|--|---|
| Name   | : R. TALJAARD   |
| Rank   | : CAPTAIN EX OFFICIO (SANDF)  |
| Number   | : 85408102PE  |
| Signature  | :  |
| Date   | : <u>25/11/2022</u>   |
| I hereby certify that this is a true and correct copy of the original document which has been presented to me. |   |
| I certify that according to my observations no alterations have been made to either the original nor the copy. |   |

I certify that the DEPONENT has acknowledged that he/she knows, and understands the content of this affidavit, that he/she does not have any objections to taking the oath, and that he/she considers it to be binding on his/her conscience and which was sworn to and signed before me

at Centurion on this the 25 day of Nov 2022 and that the administering oath complied with the regulations contained in Government Gazette.

  
E de J

"EOTJ 8"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

- |   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

RICHARD CHAD SMOUT

Do hereby make oath and say that:

1. I am an adult male with identity number 81092250591089 and residing at Acacia, Caledon Estate, Lee Burg BLVD, Bellito, 4420
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.

*Handwritten initials and marks*



3. I confirm that I am a Class 1 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 1 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
 DEPONENT

Sworn to and signed in my presence at KwaDukuza on this 25<sup>th</sup> day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

|  |                                 |   |
|--|---------------------------------|---|
| <br>Signature   | <u>Hed. Naidoo</u><br>Full Name | <br>Signature |
| COMMISSIONER OF OATHS EX OFFICIO<br>BRANCH MANAGER STANGER<br>15 JACKSON STREET<br>DATE <u>2022/11/25</u>  |                                 | COMMISSIONER OF OATHS   |
|  <p>SA POST OFFICE LTD<br/>BRANCH MANAGER<br/>2022-11-25<br/>STANGER<br/>48441</p> |                                 |   |

"E0J9"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

JAN LOUIS GROBBELAAR

Do hereby make oath and say that:

1. I am an adult male with identity number 7709275057080 and residing at Unit 2 Stonechat Village, 62 Albert Road, Irene, Centurion, 0157.
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.






3. I confirm that I am a Class 1 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 1 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
DEPONENT

Sworn to and signed in my presence at 24 Hoofden on this 25 day of NOVEMBER 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
72020326  
COMMISSIONER OF OATHS  
SUID-AFRIKAANSE POLISIEDIENS  
SAPS LYTTELTON  
2022-11-25  
COMMUNITY SERVICE CENTRE  
SOUTH AFRICAN POLICE SERVICE



"EDJ 10"

IN THE HIGH COURT OF SOUTH AFRICA

WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,<br/>CAPE TOWN</u> | Respondent |
|--|------------|

---

CONFIRMATORY AFFIDAVIT

---

I, the undersigned

PAULUS STEFANUS SWANEPOEL

Do hereby make oath and say that:

1. I am an adult male with identity number 720919 5139084 and residing at 33 PIENAAR STREET, DESPATCH, 6220
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.

3. I confirm that I am a Class 2 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 2 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
**DEPONENT**

Sworn to and signed in my presence at Durban on this 28 day of November, 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."



  
D.J. DEYSEL - W/O  
**COMMISSIONER OF OATHS**



"EDJII"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

- |  |                  |
|--|------------------|
| <u>HERMAN BESTER N.O.</u>                    | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>        | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>           | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>          | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                    | Fifth Applicant  |
| <u>C-HAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

CHARLES GRAHAM KING

Do hereby make oath and say that:

1. I am an adult male with identity number 6010115075080 and residing at 10 FICKSBURG STR, WIERDA PARK, CENTURION



Handwritten signature and initials, including the name 'F de J'.



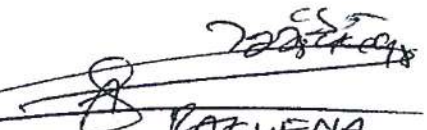
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.
3. I confirm that I am a Class 2 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 2 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
 \_\_\_\_\_  
**DEPONENT**

Sworn to and signed in my presence at WHEEDABURY on this 28 day of NOVEMBER 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
 \_\_\_\_\_  
**COMMISSIONER OF OATHS**

STATE OF CONNECTICUT  
DEPARTMENT OF CONSUMER SERVICES  
LANTORO & FLETCHER  
**2022-11-28**  
WHEELABURY  
CONNECTICUT

*E de Jager*

"EOTJ12"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

RUDOLPH JACOBUS BOSSERT

Do hereby make oath and say that:

1. I am an adult male with identity number 7101155107088 and residing at 49  
BALDWIN STREET, SCHOEMANSVILLE, NORTH WEST, SOUTH AFRICA.



2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.
3. I confirm that I am a Class 2 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 2 Investor.
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

  
DEPONENT

Sworn to and signed in my presence at Hartbeespoort on this 31 day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
72139124  
COMMISSIONER OF OATHS





"EDJ 13"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

---

CONFIRMATORY AFFIDAVIT

---

I, the undersigned

RUDOLPH JACOBUS BOSSERT

Do hereby make oath and say that:

1. I am an adult male with identity number 7101155107088 and residing at 49  
BALDWIN STREET, SCHOEMANSVILLE, NORTH WEST, SOUTH AFRICA.





2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.
3. I confirm that I am deposing to this affidavit on behalf of my minor daughter, namely Miencke Christa Bossert with identity number 0601140431086.
4. I confirm that Miencke is a Class 2 EDJ ATTORNEYS INC Investor and that Miencke has an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to her as a Class 2 Investor.
5. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to my daughter.

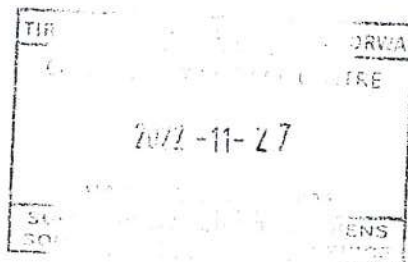
  
**DEPONENT**

Sworn to and signed in my presence at Katbergpark on this 27 day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
**COMMISSIONER OF OATHS**





"EOTJ 14"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

- |   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

---

CONFIRMATORY AFFIDAVIT

---

I, the undersigned

RUDOLPH JACOBUS BOSSERT

Do hereby make oath and say that:

1. I am an adult male with identity number 7101155107088 and residing at 49  
BALDWIN STREET, SCHOEMANSVILLE, NORTH WEST, SOUTH AFRICA.



2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.
3. I confirm that I am deposing to this affidavit on behalf of my minor daughter, namely Diwan Barend Bossert with identity number 0709115664084.
4. I confirm that Diwan is a Class 2 EDJ ATTORNEYS INC Investor and that Diwan has an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to her as a Class 2 Investor.
5. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to my daughter.

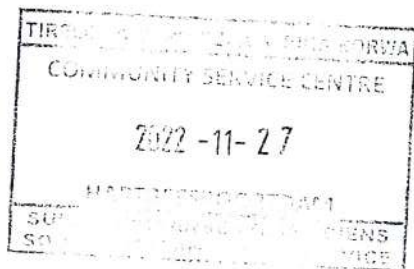
  
**DEPONENT**

Sworn to and signed in my presence at Harshkopout on this 27 day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
**COMMISSIONER OF OATHS**



*F de J*  
*nt*



"E10J 15"

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

---

CONFIRMATORY AFFIDAVIT

---

I, the undersigned

RUDOLPH JACOBUS BOSSERT

Do hereby make oath and say that:

1. I am an adult male with identity number 7101155107088 and residing at 49  
BALDWIN STREET, SCHOEMANSVILLE, NORTH WEST, SOUTH AFRICA.





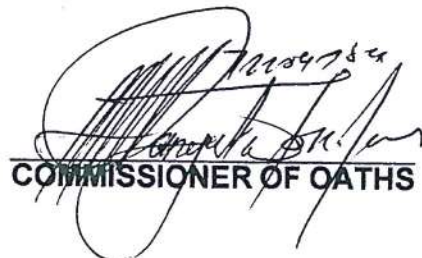
2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.
3. I confirm that I am deposing to this affidavit on behalf of my minor daughter, namely Alexa Carolina Bossert with identity number 1103300768083.
4. I confirm that Alexa is a Class 2 EDJ ATTORNEYS INC Investor and that Alexa has an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to her as a Class 2 Investor.
5. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to my daughter.

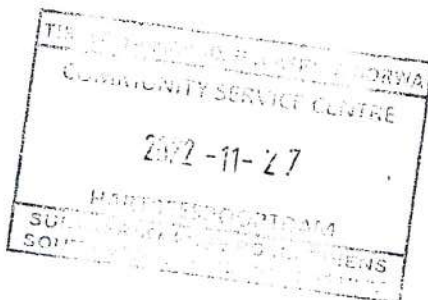
  
**DEPONENT**

Sworn to and signed in my presence at HBD/DAM on this 27 day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

  
**COMMISSIONER OF OATHS**



*E. de Jager*

EOJ16

IN THE HIGH COURT OF SOUTH AFRICA  
WESTERN CAPE DIVISION, CAPE TOWN

CASE NO: 15426/2021

In the matter between:

|   |                  |
|---|------------------|
| <u>HERMAN BESTER N.O.</u>                   | First Applicant  |
| <u>ADRIAAN WILLEM VAN ROOYEN N.O.</u>       | Second Applicant |
| <u>CHRISTOPHER JAMES ROOS N.O.</u>          | Third Applicant  |
| <u>JACOLIEN FRIEDA BARNARD N.O.</u>         | Fourth Applicant |
| <u>DEIDRE BASSON N.O.</u>                   | Fifth Applicant  |
| <u>CHAVONNES BADENHORST ST CLAIR COOPER</u> | Sixth Applicant  |

[In their capacities as the duly appointed joint liquidators  
Of Mirror Trading International (Pty) Ltd in liquidation)

And

|  |            |
|--|------------|
| <u>THE MASTER OF THE HIGH COURT,</u><br><u>CAPE TOWN</u> | Respondent |
|--|------------|

CONFIRMATORY AFFIDAVIT

I, the undersigned

SIMONE MICHAELA BOSSERT

Do hereby make oath and say that:

1. I am an adult female with identity number 8009100049082 and residing at 49  
BALDWIN STREET, SCHOEMANSVILLE, NORTH WEST, SOUTH AFRICA

2. I am duly authorized to depose this affidavit, the facts herein contained being within my own personal knowledge, unless stated to the contrary, and both true and correct.
  
3. I confirm that I am a Class 2 EDJ ATTORNEYS INC Investor and that I have an interest in the outcome of the abovementioned application because the order which the applicants seek will apply to me as a Class 2 Investor.
  
4. I confirm that I have read the affidavit of Ms Elna de Jager in the abovementioned matter and I confirm that the contents are true and correct insofar as it pertains to me.

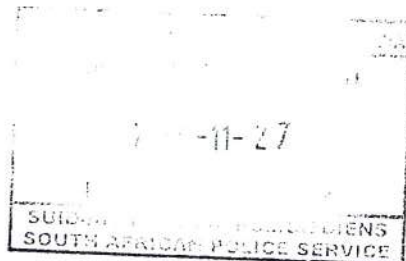
*ASwint. J. Jansen*  
DEPONENT

Sworn to and signed in my presence at Harburgwood on this 27 day of November 2022 by the deponent who declared that the deponent:

- (a) knows and understands the contents of this affidavit;
- (b) has no objection to the taking of the prescribed oath;
- (c) considers the oath to be binding on his conscience;

and uttered the words: "I swear that the contents of this affidavit are true, so help me God."

*728 9781*  
*[Signature]*  
COMMISSIONER OF OATHS



*Edg*



" EDJ17 "

**Samantha Mienies**

---

**From:** Samantha Mienies  
**Sent:** Friday, 28 October 2022 15:05  
**To:** Susan Strydom; HENRY COWLEY  
**Cc:** Elna de Jager; Johan Oberholster  
**Subject:** RE: CASE NUMBER 15426/2021 - MTI  
**Attachments:** OPPOSING AFFIDAVIT - ELNA DE JAGER - MTI.pdf

Good day Susan,

I trust that this finds you well.

With reference to the abovementioned matter.

Kindly find hereto attached service of our Opposing papers for your attention.

Please acknowledge receipt of same at your earliest convenience.

We trust that the above is in order.

Kind regards / Vriendelike groete,

**Samantha Mienies**

---

**Attorney  
EDJ Attorneys Inc.**

71 McHardy Street  
Brandwag  
Bloemfontein  
9301  
Tel : 051 - 444 2892



**EDJ ATTORNEYS INC**

*The information in or attached to this email message is confidential and may be subject to legal privilege and client confidentiality.*

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*Edj*



"E0J18"

**Samantha Mienies**

---

**From:** Susan Strydom <susan@srhinc.co.za>  
**Sent:** Friday, 28 October 2022 20:07  
**To:** Samantha Mienies; HENRY COWLEY  
**Cc:** Elna de Jager; Johan Oberholster  
**Subject:** Re: CASE NUMBER 15426/2021 - MTI

Good evening Samanta

The above matter refers.

I acknowledge receipt of your opposing papers.

Just to confirm, Advocate Pieter Lourens will appear on behalf of the applicants on Monday.

Please provide me with Advocate Cowley's details, so that we can liase with him on Monday morning.

Regards

Susan Strydom



**STRYDOM, RABIE  
& HEIJSTEK INC.**

ATTORNEYS · CONVEYANCERS · NOTARIES

In Association with Tintingers Inc.

012 786 0954 | susan@srhinc.co.za | www.srhinc.co.za  
Delmondo Office Park, Sorrento Building, Block A,  
169 Garfontein Rd, Ashlea Gardens, Pretoria  
PO Box 7111, Pretoria, 0001

---

**From:** Samantha Mienies <samantha@edjinc.co.za>  
**Date:** Friday, 28 October 2022 at 15:05  
**To:** Susan Strydom <susan@srhinc.co.za>, HENRY COWLEY <advhcowley@mweb.co.za>  
**Cc:** Elna de Jager <elna@edjinc.co.za>, Johan Oberholster <johan@heyns.co.za>  
**Subject:** RE: CASE NUMBER 15426/2021 - MTI

Good day Susan,

I trust that this finds you well.

With reference to the abovementioned matter.

Kindly find hereto attached service of our Opposing papers for your attention.

Please acknowledge receipt of same at your earliest convenience.

We trust that the above is in order.

Kind regards / Vriendelike groete,

F. de J. Mx

EDJ 19

**Samantha Mienies**

---

**From:** Susan Strydom <susan@srhinc.co.za>  
**Sent:** Saturday, 29 October 2022 22:13  
**To:** Samantha Mienies; HENRY COWLEY  
**Cc:** Elna de Jager; Johan Oberholster  
**Subject:** Re: CASE NUMBER 15426/2021 - MTI  
**Attachments:** MTI DRAFT ORDER POSTPONEMENT.docx

Good evening all

The above matter refers.

Please find attached hereto a draft order for your consideration in respect of the postponement of the above matter.

Kindly provide us with your feedback as soon as possible.

Regards  
Susan

Susan Strydom



**STRYDOM, RABIE  
& HEIJSTEK INC.**  
ATTORNEYS · CONVEYANCERS · NOTARIES

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In Association with Tintingers Inc.  
012 786 0954 | susan@srhinc.co.za | www.srhinc.co.za  
Delmondo Office Park, Sorrento Building, Block A,  
169 Garsfontein Rd, Ashlea Gardens, Pretoria  
PO Box 7111, Pretoria, 0001

---

**From:** Samantha Mienies <samantha@edjinc.co.za>  
**Date:** Friday, 28 October 2022 at 15:36  
**To:** Susan Strydom <susan@srhinc.co.za>, HENRY COWLEY <advhcowley@mweb.co.za>  
**Cc:** Elna de Jager <elna@edjinc.co.za>, Johan Oberholster <johan@heyns.co.za>  
**Subject:** RE: CASE NUMBER 15426/2021 - MTI

Kindly also find hereto attached the Practice Note for Adv Cowley for your attention.

Kind regards / Vriendelike groete,

Handwritten signature and initials.