

IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG LOCAL DIVISION, JOHANNESBURG

CASE NO: 30597/16

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

MOTARA, YASMIN

First Respondent

MAREE, CHRISTINE MARIE

Second Respondent

HEYMANS, GIDEON FRANCOIS BERNARDUS

Third Respondent

ERASMUS, SUE-ELLEN JANE

Fourth Respondent

CRYSTAL, ANDREA

Fifth Respondent

HARRIS, STEPHEN RICHARD

Sixth Respondent

DE SWARDT, RYAN ROBERT

Seventh Respondent

WILKINSON, SHAUN

Eighth Respondent

HUNTER, ADAM JASON

Ninth Respondent

NELL, ALEXANDER ROBERT

Tenth Respondent

FAROUK, AMINA

Eleventh Respondent

BILJON, CONRAD PITOUT

Twelfth Respondent

IN RE:

CASE NO 15/00995

MOTARA, YASMIN

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 14/41933

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

MAREE, CHRISTINE MARIE

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAEI

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

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<u>MAREE, CHRISTINE MARIE</u>	Applicant
and	
<u>RONALD BOBROFF AND PARTNERS INC.</u>	First Respondent
<u>BOBROFF, RONALD</u>	Second Respondent
<u>BOBROFF, DARREN RODNEY</u>	Third Respondent

AND

**IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)**

CASE NO: 15/39819

In the matter between:

RONALD BOBROFF AND PARTNERS INC. First Applicant
(Registration No: 2001/021719/21)

BOBROFF, RONALD Second Applicant

BOBROFF, DARREN RODNEY Third Applicant

and

HEYMANS, GIDEON FRANCOIS BERNARDUS First Respondent

VAN STADEN, JOHAN N.O. Second Respondent

ZIMERMAN, RAEL Third Respondent

BEZUIDENHOUT, STEPHEN Fourth Respondent

IN RE:

HEYMAN, GIDEON FRANCOIS BERNARDUS Applicant
and
RONALD BOBROFF AND PARTNERS INC. First Respondent

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BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/43159

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

ERASMUS, SUE-ELLEN JANE

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAEI

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

ERASMUS, SUE-ELLEN JANE

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

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AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/39625

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

CRYSTAL, ANDREA

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

CRYSTAL, ANDREA

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 14/35137

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

HARRIS, STEPHEN RICHARD

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

HARRIS, STEPHEN RICHARD

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/14283

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

DE SWARDT, RYAN ROBERT

First Respondent

WILKINSON, SHAUN

Second Respondent

HUNTER, ADAM JASON

Third Respondent

NELL, ALEXANDER ROBERT

Fourth Respondent

VAN STADEN, JOHAN N.O.

Fifth Respondent

ZIMERMAN, RAELE

Sixth Respondent

BEZUIDENHOUT, STEPHEN

Seventh Respondent

IN RE:

DE SWARDT, RYAN ROBERT

First Applicant

WILKINSON, SHAUN

Second Applicant

HUNTER, ADAM JASON

Third Applicant

NELL, ALEXANDER ROBERT

Fourth Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/40880

In the matter between:

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RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

FAROUK, AMINA

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

FAROUK, AMINA

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 2015/31369

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

BILJON, CONRAD PITOUT

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

BILJON, CONRAD PITOUT

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

NOTICE OF MOTION

BE PLEASED TO TAKE NOTICE that application will be made to the above Honourable Court by the Applicants, at 10H00 on Monday the 12th December 2016 or so soon thereafter as the legal representative for the Applicants may be heard, for orders in the following terms: -

1. dispensing with the time periods and forms of service ordinarily required by the Rules of Court and permitting this matter to be heard as a matter of urgency in terms of Rule 6(12) of the Uniform Rules of Court; and

2. that *viva voce* evidence of the Second and/or the Third Applicants at the hearing that is to take place as indicated in the court order of Foulkes-Jones AJ, handed down on the 1st December 2016, Annexure X hereto, be permitted to take place by way of a real time video transmission; and
3. that the *viva voce* evidence of the Second and/or the Third Applicants be accepted into evidence for the purposes of the hearing on the 12th December 2016 which hearing has been ordered for the purposes of determining as to whether attorneys Zimerman and/or Bezuidenhout had the requisite authority and power to conclude 9 settlement agreements on behalf of the Applicants, but subject to the court determining that *viva voce* evidence that was tendered and captured in an acceptable manner (both from a visual and audio perspective); and
4. if necessary that the *viva voce* evidence of the Second and/or the Third Applicants be tendered at the boardroom facilities of Foulkes-Jones AJ or alternatively at other convenient boardroom facilities within the Sandton area; and
5. that the costs of the video transmission contemplated in prayer 2 be paid by the First, Second and Third Applicants; and
6. that at the conclusion of the video transmission exercise a copy of the transmission, at the cost of the First Second and Third Applicants, be made available to Foulkes-Jones AJ and the attorneys for the Respondents; and

7. granting such further and/or alternative relief that the above Honourable Court deems necessary.

TAKE NOTICE THAT the affidavit of the Second Applicant will be used in support of this Application.

TAKE NOTICE FURTHER THAT the Applicants have appointed the offices of Attorney **JOHN JOSEPH FINLAY CAMERON**, Hurlingham Office Suites CC, Hurlingham Office Park, Block G, Ground Floor, Cnr. William Nicol & Republic Roads (entrance in Woodlands Avenue), Sandton, at which they will accept service of all processes in this matter.

TAKE NOTICE FURTHER THAT If you intend opposing this application, you must:

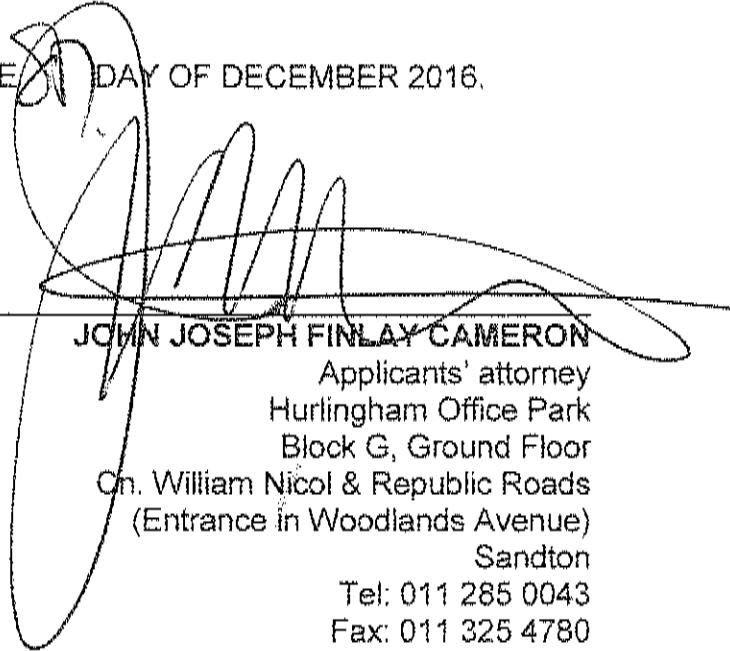
1. notify the Applicants' attorneys, before 17H00, on **THURSDAY THE 8TH DECEMBER 2016** by emailing them a notice to this effect to email address johnncam@mweb.co.za; and
2. serve and file your answering affidavit by 17H00, **ON FRIDAY THE 9TH DECEMBER 2016** by emailing such affidavits to email address johnncam@meb.co.za.

TAKE NOTICE FURTHER if no such notice of intention to oppose be given, then Application will be made on **MONDAY the 12TH DECEMBER 2016** at 10H00 or so soon thereafter as the application can be heard for orders in terms of prayers 1-6 hereinabove.

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KINDLY place the matter on the roll for hearing accordingly.

DATED AT JOHANNESBURG ON THIS THE 08 DAY OF DECEMBER 2016.


JOHN JOSEPH FINLAY CAMERON

Applicants' attorney
Hurlingham Office Park
Block G, Ground Floor
Cnr. William Nicol & Republic Roads
(Entrance in Woodlands Avenue)
Sandton
Tel: 011 285 0043
Fax: 011 325 4780
Ref: J Cameron
Email: john.cam@mweb.co.za
Cellular: 072 041 8818

TO:

THE REGISTRAR OF THE
ABOVE HONOURABLE COURT
JOHANNESBURG

AND TO:

NORMAN BERGER & PARTNERS INC.
First to Twelfth Respondents' attorneys.
84, 6th Avenue
Cnr Louis Botha Avenue
Highlands North
Johannesburg
Tel: (011) 786 3096
Ref: Mr Millar/su/961212

NORMAN BERGER & PARTNERS INC
Accepted without prejudice to clients rights

Date: 08/12/16 Time: 13H25pm

Signature: 

Received a copy hereof on this the
____ day of December 2016

AND TO:

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K FOULKES - JONES AJ
Group 16, 4th Floor Sala House
12 Fredman Drive
Sandton

Received a copy hereof on this the

day of December 2016

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IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 30597/16

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

MOTARA, YASMIN

First Respondent

MAREE, CHRISTINE MARIE

Second Respondent

HEYMANS, GIDEON FRANCOIS BERNARDUS

Third Respondent

ERASMUS, SUE-ELLEN JANE

Fourth Respondent

CRYSTAL, ANDREA

Fifth Respondent

HARRIS, STEPHEN RICHARD

Sixth Respondent

DE SWARDT, RYAN ROBERT

Seventh Respondent

WILKINSON, SHAUN

Eighth Respondent

HUNTER, ADAM JASON

Ninth Respondent

NELL, ALEXANDER ROBERT

Tenth Respondent

FAROUK, AMINA

Eleventh Respondent

BILJON, CONRAD PITOUT

Twelfth Respondent

SECOND AND THIRD APPLICANTS' FOUNDING AFFIDAVIT

I, the undersigned

RONALD BOBROFF

do hereby make oath and state: -

DEPONENT'S DESCRIPTION AND PERSONAL INFORMATION

1. I am the Second Applicant in these proceedings and am a major male legal practitioner (although having currently been suspended as practicing as such) and am temporarily residing at 11 Shannon Street, St. Ives, Sydney, Australia- I have a right to reside permanently in Australia.
2. I draw attention to the fact that the Third Applicant ("Darren") and I, by order of court, were struck from the roll of attorneys and conveyancers on the 7th December 2016 ("the Striking Order") arising from legal proceedings under Case No 20066/16 and being application proceedings launched out of the High Court of South Africa, Gauteng Division, Pretoria (the "LSNP Application"), the Applicant whereof was the Law Society of the Northern Provinces ("LSNP") (there was another similar application under Case No 61790/16 and being application

proceedings (in the nature of a counter –application) launched out of the High Court of South Africa, Gauteng Division, Pretoria (the "Graham Application") the Applicants whereof were Jennifer Graham and Matthew Graham ("the Grahams") (Matthew Graham having being and ex-client of the First Applicant ("the Firm") – there was no order granted in this application.)

3. It is furthermore necessary for me to record that prior to the 7th December 2016 that:-

3.1. Darren and I had launched an application which sought orders that the LSNP Application and the Graham Application be struck from the roll on the 6th December 2016 by reason of the fact that the LSNP Application had not been served on Darren and me in terms of Rule 4 of the Uniform Rules of Court and that the notice of set down in the Graham Application had not been served in terms of Rule 4 of the Uniform Rules of Court on Darren and me; and

3.2. alternatively to the relief indicated in paragraph 3.1 hereinabove Darren and I sought an order that the LSNP Application and the Graham Application be postponed in order that we be permitted to *inter alia* respond to the LSNP Application which specific reference to 2 forensic reports which had been commissioned and drafted by 2 forensic accountants of the LSNP; and

3.3. the application referred to in paragraph 3.1 and 3.2 hereinabove was opposed by the LSNP and the Grahams and argument in regard to the application took place on the 6th December 2016 and whereafter Darren's

and my application (referred to in paragraphs 3.1 and 3.2) was dismissed with costs; and

3.4. as Darren and my legal representatives, due to time constraints, were only in a position to argue the aforesaid application they did not participate any further in regard to the relief being sought by the LSNP and the Grahams in the LSNP Application and the Graham Application.

3.5. arising from the orders that were issued, as aforesaid, Darren and I have instructed attorney John Joseph Finlay Cameron ("Cameron") to serve and file notices of intention to appeal the orders (Cameron will cause to annex to this affidavit as Annexure X his confirmatory affidavit in regard to that matter indicated hereinbefore and will attach thereto the relevant notice of intention to appeal the LSNP Striking order).

4. By virtue of the aforesgoing and more specifically the intended service and filing of the notices of intention to appeal the striking of Darren and me from the roll of attorneys and conveyancers such orders will be accordingly suspended save that our positions will be such that we will be currently suspended from practicing as attorneys and conveyancers.

5. Until my departure from South Africa on the 19th March 2016, I was permanently residing at 40 Pentrich Road, Victory Park Estate, Johannesburg and which address continues to be my permanent residential address (my spouse currently resides at this address and is the owner of the immovable property situate thereat).

6. The facts herein contained are, save or where otherwise indicated, within my own personal knowledge and are true and correct.

IDENTITY OF THE PARTIES

7. The First Applicant is **RONALD BOBROFF AND PARTNERS INC.** a company duly registered and incorporated in accordance with the Company Laws of the Republic of South Africa ("the Firm") and which previously conducted its business at 37 Ashford Road, Rosebank, Johannesburg.
8. The Third Applicant is **DARREN RODNEY BOBROFF**, my son, temporarily residing at 26 Warimoo Street, St. Ives, Sydney, Australia. Until the Third Applicant's departure from South Africa on the 16th March 2016, the Third Applicant was resident at 13A Pentrich Road, Victory Park Estate, Johannesburg, which property continues to be registered in the Third Applicant's name and is the subject matter of a rental arrangement. I annex hereto as Annexure "FA 1" a confirmatory affidavit of Darren in regard to his support of this application and to those matters where I refer to him in this affidavit.
9. The First Respondent is **YASMIN MOTARA**, an adult female, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
10. The Second Respondent is **CHRISTINE MARIE MAREE**, an adult female, whose present place of residence and/or place of employment is unknown to me, who at

all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").

11. The Third Respondent is **GIDEON FRANCOIS BERNARDUS HEYMANS**, an adult male, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
12. The Fourth Respondent is **SUE-ELLEN JANE ERASMUS**, an adult female, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
13. The Fifth Respondent is **ANDREA CRYSTAL**, an adult female, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
14. The Sixth Respondent is **STEPHEN RICHARD HARRIS**, an adult male, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
15. The Seventh Respondent is **RYAN ROBERT DE SWARDT**, an adult male, whose present place of residence and/or place of employment is unknown to me,

who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").

16. The Eighth Respondent is **SHAUN WILKINSON**, an adult male, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
17. The Ninth Respondent is **ADAM JASON HUNTER**, an adult male, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
18. The Tenth Respondent is **ALEXANDER ROBERT NELL**, an adult whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
19. The Eleventh Respondent is **AMINA FAROUK**, an adult female, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").
20. The Twelfth Respondent is **CONRAD PITOUT BILJON**, an adult male, whose present place of residence and/or place of employment is unknown to me, who at all material times has been represented by Attorneys Norman Berger & Partners Inc., ("NBP") and more specifically Mr A Millar ("Millar").

REASONS FOR AND PURPOSE OF THIS APPLICATION AND THE LEGAL AUTHORITY RELIED UPON BY THE APPLICANTS

21. On the 2nd December 2016 an order (a judgment) of Foulkes – Jones AJ (the Presiding Judge) was handed down, a copy whereof I annex hereto as Annexure FA 2. In Annexure FA 2 the Presiding Judge ordered that *viva voce* evidence be tendered at a hearing before her on the 12th and possibly on the 13th December 2016, the issue that is to be determined thereat is whether 2 attorneys, Mr Rael Zimerman ("Zimerman") and Mr Stephen Derek Bezuidenhout ("Bezuidenhout") (an erstwhile director of the Firm) had the necessary authority and power to conclude 9 settlement agreements on behalf of the Firm, Darren and me (Darren and I having always contended that Zimerman and Bezuidenhout had no authority to sign the 9 settlement agreements on behalf of the Firm, Darren and me.

22. Although there is not a plethora of reported judgments which refer to courts permitting evidence via video link Cameron has located a judgment of Satchwell J in the matter between Uramin Incorporated in British Columbia v/s Carolyn Perie Case No 28154/2011 ("the Satchwell Judgment"). In the Satchwell Judgment Satchwell J recorded (in paragraph 6) that "*the technology of the video link is now accepted both in other jurisdictions and South Africa as an efficient and an effective way of providing oral evidence both in chief and in cross-examination and that this is simply another tool for securing effective access to justice*".

23. As I will indicate herein below there are circumstances beyond the control of Darren and I to be present at the hearings on the 12th and 13th December 2016.

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What is even more important and crucial is that Darren and/or I be permitted to testify (and to be cross-examined) in regard to the issue that is to be adjudicated upon. Should Darren and/or I not be permitted to testify via video link then we contend that our fundamental right "to be heard" will be infringed and the financial harm will be irreparable and far reaching – leaving aside the fact that the 12 ex-clients of the Firm will obtain a financial advantage to which they are not entitled.

REASONS WHY IT IS NOT POSSIBLE FOR THE THIRD AND FOURTH APPLICANTS TO BE PRESENT AT THE HEARINGS IN PERSON

24. The reasons why Darren and I are not able to attend the hearings in person fall into 2 categories (2 categories apply to me and 1 category applies to Darren).

THE SECOND APPLICANT'S HEATH

25. I have suffered from a condition known as cardiac arrhythmias since 2007 when I suffered an attack known as Supra Ventricular Tachycardia – this condition constitutes an electrical malfunction of the heart's natural pace maker and which condition presently subsists and is of such a nature that under extreme stressful conditions can result in a heart attack or a stroke and can result in my death.

26. I am attaching hereto as Annexures FA 3 and FA 4 two basic reports of Dr M Atlas and Dr Peter Illes - unfortunately I am unable to obtain comprehensive reports in the form of affidavits from these medical practitioners as they have both refused to depose to affidavits which will result in them having to travel to and from a Justice of the Peace and will also necessitate them having to consult with their own attorney as to whether they should depose to affidavits relative to my

medical condition as well as what should be recorded therein (Cameron having indicated to me that, if at all possible, such reports should be comprehensive in nature).

27. My medical history in regard to the medical heart condition can be summarised as follows :-

27.1. In 2007 I was injected with a drug designed to "stop the heart" and thereafter and by gradual process my heart rate was returned to a normal rate; and

27.2. since 2007 I have taken anti arrhythmia medication; and

27.3. in 2010 I suffered a further attack of Supra Ventricular Tachycardia and as a consequence thereof an ablation procedure was undertaken; and

27.4. in March 2011 I was hospitalised at the Milpark medical facility and remained in such facility for 1 day until my heart rhythm and rate was restored to normality. In December 2015 I suffered an acute attack of Supra Ventricular Tachycardia and was again hospitalised at the Plettenberg Bay Medical facility; and

27.5. Since 2015 due to stress, related to threats and circumstances surrounding litigation between the Firm and various parties, I have continued to suffer health problems which has resulted in chest tightness and breathing difficulties; and

27.6. On the 24th October 2016 I experienced an indescribable sensation which led me to believe that I was in the process of suffering a heart attack. I was

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admitted to the San Hospital in Sydney and was admitted to an intensive care unit and medical treatment was rendered and after tests were undertaken I was advised by Dr Illes that because 2 of my heart valves do not close completely these cause the creation of blood clots which form during atrial fibrillation (as a consequence of stress and these flow through the blood stream and can flow to the brain with devastating affects); and

27.7. my medical condition is such that I have been prescribed powerful drugs to avoid a heart attack or a stroke which are inevitable if I am placed in situations which are of a stressful nature.

THREATS AND PHYSICAL HARM INCLUDING ARREST AND INCARCERATION
SHOULD THE SECOND AND THIRD APPLICANTS RETURN TO SOUTH AFRICA

28. On the 17th and 20th March 2016, Darren (his spouse and 2 minor children) and I left South Africa and which we did so under the circumstances indicated herein below.

29. The first threats (Bezuidenhout had already been threatened by Attorney Katz, a full time employee of Discovery Health in 2014) that Darren and I experienced (which was the first of many threats including abusive telephone calls including a deluge of email and twitter messages from Attorney Millar and a reporter, Beamish) was when Attorney Katz, an employee of Discovery Health Life, had and on the 16th June 2015, uttered threats which traumatised Darren's 2 minor children and his wife. The seriousness of the threats were such that Darren addressed a communication to the LSNP dated the 30th July 2015 and which I annex hereto as Annexure FA 5 (Annexure FA 5 was addressed to the LSNP

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and by virtue of the fact that Katz is a duly admitted attorney and Darren and I considered Katz' threats as constituting unprofessional conduct and worthy of the LSNP conducting the relevant disciplinary hearing (the LSNP acknowledged receipt of Annexure FA 5 after a long passage of time to request an acknowledgement of receipt and its legal officer, Mr J Fourie, permitted Katz a period of 6 months within which to respond to the complaint – the usual response period being 14 days - nor conducted the relevant disciplinary hearing into Katz' conduct).

30. The "final" event that led to Darren and myself departing South Africa was a telephone call to me and at the offices of the Firm and on the 15th March 2016:-

30.1. the person who telephonically contacted me had disguised his voice electronically and the words were uttered in a "robotic" form; and

30.2. this person advised me that Darren, Darren's spouse and myself were in grave and imminent danger, which danger was to the effect that we would be arrested by the SAPS, would be incarcerated and that there were persons within the prison system that had been specifically engaged (employed) so as to exact physically harm on us including harm in the nature of being raped.

31. I draw attention to the fact that when Darren and I departed South Africa, it was our intention to return within a few days and once we had investigated the source of the threat referred to herein below. I annex hereto as Annexures FA

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6 and FA 7, the electronic air travel tickets which indicate that Darren and I intended to return to the Republic on the 22nd March 2016 (these air tickets have not been cancelled and/or encashed by ourselves and we intend to utilise same and in order to return to our respective homes in South Africa).

32. Although I am unable to prove that the same person was involved in the incident referred to herein below, Darren and I contend that our fears were well founded and as a consequence of:-

32.1. me receiving on my cellular telephone, whilst in Sydney, a text message, a screen grab whereof I annex hereto as **Annexure FA 8** – as is self-evident from Annexure FA 8, I received this text message early in Sydney on the morning of the 22nd March 2016 and at that stage it was 07h15 on the 21st March 2016 in South Africa; and

32.2. as will be noticed from Annexure FA 8, the text message was to the effect that the Hawks intended arresting “wives” at 07h30 at Cassim’s house (this is a reference to Adv Nazeer Cassim S.C. – how this person knew that my wife was to consult with Adv N Cassim on the 21st March 2016 and at 07h30 is yet another cause for concern).

33. The event indicated in paragraph 32 was of such a nature that Darren and I perceived that Darren, Darren’s spouse and I were in imminent danger and as our “lives” were at risk it would be absolutely necessary to depart from South Africa for a few days and during which time a private investigator would investigate

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various persons that we suspected to be involved in ensuring that we be arrested by the SAPS and be subject to abuse within the South African prison system.

34. Notwithstanding our presence in Australia, 3 abusive communications have been received by Darren and me. I annex hereto as **Annexures FA 9, FA 10 and FA 11**, emails dated the 18th October 2016, the 4th November 2016 and the 21st November 2016. It is self-evident from the contents of Annexures FA 9, FA 10 and FA 11 that the person or persons concerned are mentally unstable and although the person/persons threaten physical harm aimed at harming Darren's children in Australia and my daughters in South Africa, these threats are treated by Darren and I seriously (unfortunately, Darren and I have little faith including confidence of being protected by the South African Police Services in South Africa and we would rather take our chances in Australia and be protected by the Australian Police Services).

35. The obvious instability of the authors of Annexures FA 9, FA 10 and FA 11 are of such a nature that Darren and I believe that this person/these persons are issuing threats aimed at pressurising Darren and I to return to South Africa and whereafter we would be the subject matter of all manner of attempts on our lives and if not attempts on our lives, serious assaults on our persons (as I have indicated herein above, the person/persons concerned are mentally unstable and no doubt their mental instability will be accelerated should we be successful in opposing the LSNP Application and the Graham Counter Application).

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THE PROCURING OF A VIDEO LINK ENTERPRISE

36. Cameron has located a video link business enterprise for the purposes of having my evidence and that of Darren's electronically transmitted into a court at the above Honourable Court and if this is not possible (a dry run of such link is scheduled to take place on the 9th December 2016) – I am attaching hereto a communication address by Cameron to AMD Conference Solutions as Annexure FA 12.

URGENCY

37. This application arises from the order of Judge Foulkes-Jones and as I have indicated hereinabove was handed down on the 2nd December 2016. Unfortunately it was not possible for Cameron to have drafted this affidavit and to have served the papers prior to the envisaged date of service (8th December 2016) by virtue of the fact that Cameron and his counsel since the 1st December 2016 have been involved in those applications indicated hereinabove including drafting affidavits and preparing for the application hearings.

38. It is obvious that by its nature this application is urgent and has been launched as soon as possible after the handing down of Judge Foulke-Jones' order.

SUBMISSIONS AND CONTENTIONS

39. Darren and I contend and submit that:-

39.1. it is in the interests of justice that we testify at the hearing on the 12th and 13th December 2016; and

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39.2. we should be entitled to tender our evidence by way of video link and more specifically for the reason that I have a serious medical condition and Darren and I "fear for our lives" and at the very best fear for our personal safety i.e. the threats that have been received are of a serious nature and we have no confidence in the SAPS protecting us so as to ensure that no assaults take place; and

39.3. we have procured the services of a video link specialist; and

39.4. there can be no prejudice to any party should our evidence be tendered by way of a video link.

WHEREFORE Darren and I pray that it may please the above Honourable Court to grant us the relief we seek in the notice of motion to which this my affidavit is annexed.

RONALD BOBROFF

I certify that the deponent has affirmed that he knows and understands the contents of this affidavit which was signed and sworn to before me at Melbourne, Australia on this the _____ day of December 2016 in compliance with the Laws of New South Wales, Australia.

Before me: _____ (Name of witness)

Signature of witness: _____

17
30

APOSTILLE

(in terms of the Hague Convention dated 5th October 1961)

1. Country : Australia

This apostille has been signed by

2. _____

3. acting in the capacity as: Notary/Justice of the Peace/Commissioner of Oaths

4. which bears the seal / stamp of the Notary/Justice of the Peace/ Commissioner of Oaths

Certificate

5. at Melbourne, Australia

6. on the December 2016

7. by: _____

8. Registration Number (if any): _____

9. that person whose signature appears hereinabove was appended by him in my presence I satisfying myself as to his identity.

10. Signature: _____

STAMP OF THE NOTARY/JUSTICE OF THE PEACE/COMMISSIONER OF OATHS

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

32
FAI
CASE NO: 30597/16

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

MOTARA, YASMIN

First Respondent

MAREE, CHRISTINE MARIE

Second Respondent

HEYMANS, GIDEON FRANCOIS BERNARDUS

Third Respondent

ERASMUS, SUE-ELLEN JANE

Fourth Respondent

CRYSTAL, ANDREA

Fifth Respondent

HARRIS, STEPHEN RICHARD

Sixth Respondent

DE SWARDT, RYAN ROBERT

Seventh Respondent

WILKINSON, SHAUN

Eighth Respondent

HUNTER, ADAM JASON

Ninth Respondent

NELL, ALEXANDER ROBERT

Tenth Respondent

FAROUK, AMINA

Eleventh Respondent

BILJON, CONRAD PITOUT

Twelfth Respondent

IN RE:

CASE NO 15/00995

MOTARA, YASMIN

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 14/41933

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

MAREE, CHRISTINE MARIE

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

MAREE, CHRISTINE MARIE

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/39819

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

35
4

BOBROFF, DARREN RODNEY

Third Applicant

and

HEYMANS, GIDEON FRANCOIS BERNARDUS

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

HEYMANS, GIDEON FRANCOIS BERNARDUS

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/43159

In the matter between:

RONALD BOBROFF AND PARTNERS INC.

First Applicant

(Registration No: 2001/021719/21)

BOBROFF, RONALD Second Applicant

BOBROFF, DARREN RODNEY Third Applicant

and

ERASMUS, SUE-ELLEN JANE First Respondent

VAN STADEN, JOHAN N.O. Second Respondent

ZIMERMAN, RAELE Third Respondent

BEZUIDENHOUT, STEPHEN Fourth Respondent

IN RE:

ERASMUS, SUE-ELLEN JANE Applicant

and

RONALD BOBROFF AND PARTNERS INC. First Respondent

BOBROFF, RONALD Second Respondent

BOBROFF, DARREN RODNEY Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA

36

(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/39625

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

CRYSTAL, ANDREA

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

CRYSTAL, ANDREA

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

35

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 14/35137

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

HARRIS, STEPHEN RICHARD

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

HARRIS, STEPHEN RICHARD

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/14283

In the matter between:

RONALD BOBROFF AND PARTNERS INC.

First Applicant

(Registration No: 2001/021719/21)

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

DE SWARDT, RYAN ROBERT

First Respondent

WILKINSON, SHAUN

Second Respondent

HUNTER, ADAM JASON

Third Respondent

NELL, ALEXANDER ROBERT

Fourth Respondent

CC 6
9

VAN STADEN, JOHAN N.O. Fifth Respondent

ZIMERMAN, RAELE Sixth Respondent

BEZUIDENHOUT, STEPHEN Seventh Respondent

IN RE:

DE SWARDT, RYAN ROBERT First Applicant

WILKINSON, SHAUN Second Applicant

HUNTER, ADAM JASON Third Applicant

NELL, ALEXANDER ROBERT Fourth Applicant

and

RONALD BOBROFF AND PARTNERS INC. First Respondent

BOBROFF, RONALD Second Respondent

BOBROFF, DARREN RODNEY Third Respondent

AND

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 15/40880

In the matter between:

41
10

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

FAROUK, AMINA

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAEEL

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

FAROUK, AMINA

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

BOBROFF, DARREN RODNEY

Third Respondent

AND

62
11

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 2015/31369

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

BILJON, CONRAD PITOUT

First Respondent

VAN STADEN, JOHAN N.O.

Second Respondent

ZIMERMAN, RAELE

Third Respondent

BEZUIDENHOUT, STEPHEN

Fourth Respondent

IN RE:

BILJON, CONRAD PITOUT

Applicant

and

RONALD BOBROFF AND PARTNERS INC.

First Respondent

BOBROFF, RONALD

Second Respondent

43
12

BOBROFF, DARREN RODNEY

Third Respondent

CONFIRMATORY AFFIDAVIT

I, the undersigned

DARREN BOBROFF

do hereby make oath and state:

1. I am the Second Applicant in these proceedings and am a major male legal practitioner (although currently having been suspended from practicing as an attorney) and am temporarily residing at 11 Shannon Street, St. Ives, Sydney, Australia. The facts herein contained are, save or where otherwise indicated, within my own personal knowledge and are true and correct.

2. I have read the affidavit of Ronald Bobroff dated the 8th December 2016 and I confirm the contents thereof insofar as they relate to me.

DARREN BOBROFF

I certify that the deponent has affirmed that he knows and understands the contents of this affidavit which was signed and sworn to before me at Sydney Australia on this the 8th day of December 2016 in compliance with the Laws of New South Wales, Australia.

Before me: _____ (Name of witness)

Signature of witness: _____

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APOSTILLE

(in terms of the Hague Convention dated 5th October 1961)

1. Country : Australia

This apostille has been signed by

2. _____

3. acting in the capacity as: Notary/Justice of the Peace/Commissioner of Oaths

4. which bears the seal / stamp of the Notary/Justice of the Peace/ Commissioner of Oaths

Certificate

5. at Sydney, Australia

6. on the 8th day of December 2016

7. by: _____

8. Registration Number (if any): _____

9. that person whose signature appears hereinabove was appended by him in my presence I satisfying myself as to his identity.

10. Signature: _____

STAMP OF THE NOTARY/JUSTICE OF THE PEACE/COMMISSIONER OF OATHS

Applicant's DRAFT

Draft order/Bobroff Motara and 11 others 30597-16

2/12/2016
Page 1 of 5

IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG LOCAL DIVISION, JOHANNESBURG)

CASE NO: 30597/16

In the matter between:

RONALD BOBROFF AND PARTNERS INC.
(Registration No: 2001/021719/21)

First Applicant

BOBROFF, RONALD

Second Applicant

BOBROFF, DARREN RODNEY

Third Applicant

and

MOTARA, YASMIN

First Respondent

MAREE, CHRISTINE MARIE

Second Respondent

HEYMANS, GIDEON FRANCOIS BERNARDUS

Third Respondent

ERASMUS, SUE-ELLEN JANE

Fourth Respondent

CRYSTAL, ANDREA

Fifth Respondent

HARRIS, STEPHEN RICHARD

Sixth Respondent

DE SWARDT, RYAN ROBERT

Seventh Respondent

WILKINSON, SHAUN

Eighth Respondent

HUNTER, ADAM JASON

Ninth Respondent

LL

NELL, ALEXANDER ROBERT

Tenth Respondent

FAROUK, AMINA

Eleventh Respondent

BILJON, CONRAD PITOUT

Twelfth Respondent

~~COURT ORDER~~ COURT ORDER

2nd DECEMBER
NOVEMBER 2016, BEFORE FOULKES-JONES J

HAVING CONSIDERED THE MATTER AND HEARD COUNSEL FOR THE PARTIES, IT IS ORDERED THAT:

1. The Respondents are interdicted from taking any further steps to enforce the 9 settlement agreements which were subsequently made orders of court until the final determination of this application.
2. The application is postponed to a hearing date to be arranged with the Deputy Judge President of this Court for the hearing of oral evidence in connection with the issue referred to herein below.
3. The referred issue to be resolved at the hearing contemplated in order 2 is whether the Stephen Bezuidenhout and Rael Zimmerman were authorised to conclude the settlement agreements concluded and signed by them for and on behalf of the Applicants.
4. The evidence to be adduced at the hearing shall be that of any witnesses the parties may elect to call, and in particular:

4.1, for the Applicants: Ronald Bobroff and/or Darren Bobroff and/or attorney John Joseph Finlay Cameron; and

4.2, for the Respondents: Stephen Bezuidenhout and Rael Zimmerman.

5. Save in the case of any persons who have already deposed to affidavits in these proceedings, neither party shall be entitled to call any person as a witness, save with the leave of the Court and after a notice has been served on the other party at least 7 (seven) days before the date appointed for the hearing.
6. Within 7 (seven) days of the date of this order, any of the parties, who wish to do so, shall make discovery on oath of all documents relating to the issue referred to above which are or have, at any time, been in possession or under control of such parties (provided that no discovery shall be necessary in respect of any documents forming part of any Court papers presently in existence or exchanged between the parties subsequent hereto).
7. Such discovery, if necessary, shall be made in accordance with Rule 35 of the Uniform Rules of Court and the provision of that Rule with regard to the inspection and production of such documents discovered shall be operative save that the time periods in the Rule shall be truncated so as to ensure that the matter is ripe for hearing on the allocated date.
8. The matter shall otherwise be conducted in accordance with the Uniform Rules of Court including the convening of and conducting of a pre-trial conference as contemplated in Rule 37 of the Uniform Rules of Court.

9. The Applicants' & rescission applications involving those parties under those case numbers indicated in Annexure A hereto will be enrolled for a hearing on the same date that the referral issue is enrolled for a hearing.

10. Costs of this application are reserved for determination at the conclusion of the hearing contemplated in prayer 2.

BY ORDER OF COURT

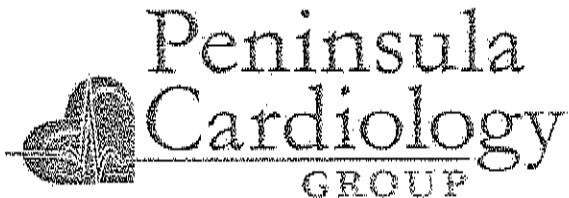
REGISTRAR

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ANNEXURE A

**LIST OF APPLICATIONS LAUNCHED BY VARIOUS PARTNERS
AGAINST RONALD BOBROFF & PARTNERS INC. AND ITS DIRECTORS**

ITEM	APPLICANT'S NAME	CASE NO.
1.	Steven Harris	14/35137
2.	Christine Maree	14/41933
3.	Yasmin Motara	15/00395
4.	Ryan de Swardt	15/14283
5.	Shaun Wilkinson	15/14283
6.	Adam Hunter	15/14283
7.	Alexander Nell	15/14283
8.	Conrad Biljon	15/31369
9.	Andrea Crystal	15/39625
10.	Gideon Heymans	15/39819
11.	Amina Farouk	15/40880
12.	Sue-Ellen Erasmus	15/43159



Thomas Gavaghan
MB, BS (NSW) FRACP

Peter Illes
MBBS (WITS), FCP (SA) FRACP

Masami Miyashita
MB, BS (NSW) FRACP

Susan Wright
MBCHB, MMEDSCI, PhD FRACP

Dylan Wynne
MB,BS ;B.Sc;PhD (Lon) FRACP

Cathie Forster
BSC (MED); MB, BS FRACP

FAB

SC

10th November 2016

To whom it may concern,

Re: Mr Ronald Bobroff, DOB: 7/08/1947
11 Shannon Street, ST IVES NSW 2075

Mr Bobroff has been under my treatment for cardiac arrhythmias. These are aggravated by stress and emotional upheaval.

He has minor structural cardiac disease and at present his arrhythmias are poorly controlled. I have advised him to take steps to minimise stress to prevent recurrence of these arrhythmias which can result in embolic stroke.

It would be in his interest to try resolve his stress issues to prevent further health issues

Yours sincerely

DR PETER ILLES, FRACP
CONSULTANT CARDIOLOGIST
Provider No. 2196278X – Mona Vale

Pl:df

Dee Why	Mona Vale	Wahroonga	Diagnostic Centres
Seascape Suite 14 22 Fisher Road 2099 P: 9982 8300 F: 9971 1594	Peninsula Plaza Level 5, Suite 503 20 Bungan Street 2103 P: 9979 6499 F: 9979 6962	San Clinic Level 5, Suite 502 185 Fox Valley Road 2076 P: 9473 8522 F: 9473 8523	Diagnostic Centre Suite 10 22 Fisher Road 2099 P: 9971 7668 F: 9971 7171

Dr. Michael Atlas Pty Ltd ACN 069 598 732
M.B.A(V)M.B.B.S(U.N.S.W)HONS
29 Stanley Street, Telephone: 9449 1908
St Ives 2075 Facsimile: 9449 3458
Provider No: 477559K Email: drmichaelatlas@bigpond.net.au
AGPAC Accredited
Practice

..... 7/12/2016

Dear Sir/Madam

Herewith Mr. Ronald Bobroff

DOB 07/03/2016

Came to see me today complaining of significant
STRESS.

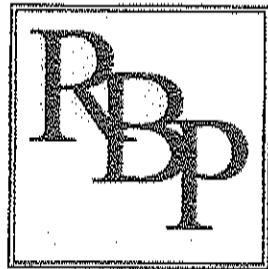
I saw him for the first time on 21/04/2016 with
symptoms of depression and referred him to
psychiatrist who commenced him on Pristiq 50
mg.....
I am also aware of recent admission to the SAN
Hospital with Acute Atrial Fibrillation under Dr.
Peter Iles who advised to avoid stressful
situations and I Agree with
that.....

Dr. M. Atlas
M.B.A(V)M.B.B.S(U.N.S.W)HONS
29 Stanley Street, St Ives 2075
9449 1908

Many thanks

Yours sincerely

SI
FAC



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FAS

RONALD BOBROFF & PARTNERS INC.

THE MEDICAL MALPRACTICE AND PERSONAL INJURY CLAIM ATTORNEYS

Est. 1974

P.O. Box 1170
Parklands
2121
Tel: (011) 880-6781 / 2 / 3
Website: www.bobroff.co.za
E-mail address: info@bobroff.co.za
For prompt response: ronaldb@bobroff.co.za

37 Ashford Road
Rosebank
2196
Fax: (011) 880-6784
Docex 153, Jhb

OUR REF:- MR R BOBROFF/rs

YOUR REF:-

30 July 2015

MR T GROBLER, DIRECTOR LSNP
SUSANL@lsnp.org.za
MS M MALATJI, HEAD DISCIPLINARY DEPARTMENT
THE LAW SOCIETY OF THE NORTHERN PROVINCES
PER EMAIL motila@lsnp.org.za

Cc MR S S MADBIDA
smadiba@mweb.co.za

BY HAND – PER REGISTERED MAIL – PER EMAIL

Dear Sirs/Madam

RE: COMPLAINT AGAINST ATTORNEY JEFFREY KATZ

We advise as follows:

1. On 16 June 2015, at approximately 13:30 RBP Director, Darren Bobroff and his family including his two children and some friends were seated at the Grand Central Café Restaurant at Melrose Arch.

DIRECTORS: MANAGING - RONALD BOBROFF B.A. LL.B (WITWATERSRAND),
STEPHEN BEZUIDENHOUT: B PROC (WITWATERSRAND);
DARREN BOBROFF: B.A LL.B (WITWATERSRAND),
PROFESSIONALLY ASSISTED BY:

VANESSA VALENTE: BA LLB (WITWATERSRAND); PHILIPPA JANE LEISEGANG: B.A. LL.B (UN);
MARIANGELA VENTURE: B COM LAW, LLB, H Dip (Tax) (UJ);
INTERNAL ACCOUNTANT: NATASCHA DA COSTA;

ESTABLISHED 1974

(Reg. No. 2001/021719/21 ~ Vol No. 463 0204974)

S3

2. Discovery Health Administrators employee, Jeffrey Katz and his family were also patrons at the same restaurant. Katz walked up to the table at which Darren Bobroff and his family were seated and made the following threats and statements:

- a. "You are going to jail";
- b. "The Hawks are onto you and will be arresting you soon";
- c. "You have no idea how many of your clients we have";
- d. "The fund are investigating you and the CEO Eugene Watson hates you. I don't know why he hates you so much";
- e. "We (Discovery) will never stop. We have unlimited money";
- f. "I know about Van Der Merwe and the ten per cent you gave him";
- g. "We know about your account in Hong Kong with R350 million";
- h. "You have never won anything against us and Millar and by now you should know why";
- i. "You briefed Hellens because you need a criminal counsel";
- j. "We will see to it, no matter what it takes, that the Grahams will never have to face Hellens at the Law Society";
- k. "You should pay back the contingency fees money you stole from your clients to reduce your sentence";
- l. "We have seen to it that Anthony Millar will be your next Law Society President and De Broglio, Vice President."
- m. "You shouldn't waste your time lodging any more complaints against Millar. You must have realised by now, these will go nowhere as has been the case with all complaints you have lodged";
- n. "Why do you think every complaint against you guys by us and Millar is acted on quickly and you are always before Committees?"
- o. "We know exactly what happens and when it happens at Council meetings, and in the Disciplinary Department, and you would be very worried if I told you what our friends are doing for us at the Law Society".

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3. Darren Bobroff's children were extremely traumatised by Katz's statement "You are going to jail". In particular his youngest son, who is five years old, now won't leave his father's side, insists on sleeping with him, and weeps when Darren leaves for work.

3.1 Katz's threats in which he clearly speaks for his employer, Discovery Health, as noted in paragraphs 2c, e, g, h, j, l, n and o above, confirm, despite apparent perjury by its Attorney, Mr George Van Niekerk of ENS, Cape Town, as referred to below and in paragraph 5.1, that Discovery Health, through its in-house attorney/debt collector, Katz, is indeed behind every attack launched against the writer, Darren Bobroff and RBP Inc under the pretext of "assisting" RBP former client, Mr Graham, as also conspiring with Millar to attack our LSNP compliant common-law contingency fee agreements.

3.1.1 Discovery's Attorney, Mr George Van Niekerk of ENS, Cape Town had stated on oath in a 49 (11) application brought by him against the Law Society and the writer and the Practice of RBP on the 30 October 2014 under case no. 2012/61790 that, "I reiterate that Discovery Health is not a party to this litigation directly or indirectly".

DOCUMENTED AND CIRCUMSTANTIAL EVIDENCE OF DISCOVERY HEALTH'S VENDETTA AGAINST RONALD AND DARREN BOBROFF AND RBP INC, EXECUTED THROUGH ITS EMPLOYEE, MR JEFFREY KATZ, ITS ATTORNEY MR GEORGE VAN NIEKERK OF ENS CAPE TOWN, IN COLLUSION WITH PROXIES, MR ANTHONY MILLAR AND MR BEAMISH

4. 4.1 Where reference has been made to subject matter in the above heading, this substantiates by reference below to specific portions of affidavits filed in Court by the Law Society, Van Niekerk and Mrs Graham, that what has actually occurred in various fora, and at the Law Society, during the four and a half year vendetta conducted by Discovery and its proxies; gives credence to the content of Mr Katz's threats and statements in paragraph 2 above.

4.2 It is surely no coincidence that Katz has been present in Court together with attorneys Millar and Berger, and Discovery proxy "reporter" Beamish, in every matter litigated against RBP by Millar. This notwithstanding that the litigation did not involve a Discovery member.

4.3 Similarly, it was no coincidence that Messrs Millar and Berger were seated together with Katz and Beamish in Court, during the arguing of matters in which Messrs Millar and Berger were not involved in any way whatsoever.

4.4 Having regard to the above, taken together with the fact that Millar, Katz and Beamish have consistently communicated with each other concerning attacks on

SS

the writer, Darren Bobroff and RBP Inc, via email, twitter and What's Apps, **INCLUDING** Millar's tweet to Katz and Beamish detailing the confidential LSNP Resolution, 26 June 2015, to inspect RBP's books; **much of what Katz states in his threats resonates with what has actually occurred in various fora, and in respect of the special resolution at the LSNP AGM to force an election of the statutory councillors thereby creating an opportunity for Millar to become a councillor, and the subsequent special meeting of members events, within the Law Society Disciplinary Department concerning Millar/RBP, and the Council Resolution of the 26 June 2015.**

5.

- 5.1 Whereas Mr Van Niekerk has stated on oath as referred to in paragraph 3.1.1 above that "I reiterate that Discovery Health is not a party to this litigation directly or indirectly", he has stated exactly the opposite in a press release issued by him on the 29 October 2012 headed "Statement by Mr George Van Niekerk, Director ENS" - "ENS (Edward Nathan Sonnenbergs) was instructed by Discovery Holdings to assist a number of the members of the Discovery Health Medical Scheme, who were former clients of Ronald and Darren Bobroff of Ronald Bobroff & Partners Inc attorneys ("RBP")."
- 5.2 Further, Mrs Graham stated on Page 19 of her founding affidavit in the Application against RBP/LSNP, prepared by Van Niekerk, in Case No. 61790/2012, at paragraph 88.3 "Discovery had engaged George to represent such of its members as might wish to have their fee arrangements with RBP reassessed. The service would be provided at no cost to such members" i.e. Discovery would be funding Mr Van Niekerk's services." Mrs Graham also makes reference in her affidavit to interactions with Mr Katz and involving the Grahams. It is of course, Van Niekerk who has at all times been instructed by Katz who has been present with him in Court, in respect of every proceeding against us.
- 5.3 It seems clear that Mr Van Niekerk, having previously been accused by the Law Society in the Graham matter as having perjured himself, has done so again.

6. 6.1 Significantly, the Law Society itself has deposed in affidavits filed in the Graham application, **that such application**, and by implication all actions in the Grahams' name conducted by Mr Van Niekerk – who is invariably the deponent in all the substantive affidavits, rather than the Grahams, - **were effectively done at the instance of, and for the benefit of Discovery, and not former RBP client, Mr Graham, as per the untrue media statements put out by Discovery's CEO Broomborg, Katz, Van Niekerk and Beamish. See Affidavit dated 04 April 2013 – paragraph 10.5 in the Graham matter under Case No. 61790/2012 –**

"despite the obvious involvement of Discovery, Van Niekerk attempts to explain that the applicants bring the application in the interests of the public. I do

not accept this contention, especially in view of the fact that the applicant's legal costs in the application are paid by Discovery. It is furthermore apparent that this application is the result of a personal and highly acrimonious dispute between Discovery, assisted by Van Niekerk and the third respondent, (Ronald Bobroff)."

- 6.3 It is therefore clear that all the Court, Media and Law Society attacks/complaints against the writer, Darren Bobroff and RBP Inc, since 2011 to date, emanate from Katz, on behalf of Discovery, DIRECTLY via Katz's instructions to Van Niekerk; and INDIRECTLY via instructions given by Katz to Millar, invariably targeting RBP clients/ Discovery members, who were charged Law Society compliant common-law percentage fees by RBP.
- 6.4 Notwithstanding the above, and incontrovertible evidence to the contrary, Mr Van Niekerk continues to persist in the farce that, Mr Graham and his wife are his real clients in the normal course of events, notwithstanding that:
 - 6.4.1 The Grahams do not make the substantive affidavits in all the court proceedings launched in their names,
 - 6.4.2 Van Niekerk deposed to virtually every substantive affidavit in the multitude of proceedings instituted by himself, instructed and paid by Discovery, and masquerading as proceedings brought on the instructions and for the benefit of Mr Graham;
 - 6.4.3 the Grahams have not attended numerous of the proceedings, at the Law Society allegedly brought at their instance for their benefit by Van Niekerk;
 - 6.4.4 the Grahams do not attend the Court proceedings in respect of applications brought in their names and ostensibly for Mr Graham's benefit. In particular they were not present for the full three days of argument in the Pretoria High Court from 27 – 29 January 2014.
- 6.5 The collusion and common purpose between Discovery/Katz and Millar as a proxy for Katz, is graphically apparent from the fact that Katz with his entire compliment of staff, and Messrs. Berger and Millar, together with all their professional staff, were present for the full three days, at the Graham Court hearing in January 2014, **AND IN FACT AT EVERY SINGLE COURT HEARING** conceived, formulated and launched by Mr Van Niekerk, instructed and paid by Discovery; notwithstanding that they, (Berger and Millar), had no involvement whatsoever in those matters.
- 6.6 As was stated by Legal Official Jaco Fourie in September 2014 when speaking with the writer, despite the unprecedented media campaign waged by Discovery and its proxies against the writer in September 2014 and RBP Inc, commencing 2011 onwards, there had not been during the intervening four years **A SINGLE COMPLAINT AGAINST THE PRACTICE OF RBP, FROM ANY PERSON OTHER THAN THE FEW RBP CLIENTS WHO FELL INTO MILLAR'S HANDS, AND OF COURSE, BY VAN NIEKERK IN RESPECT OF MR GRAHAM AND HIS WIFE.**
- 6.7 Significantly that remains the position to date, despite Discovery harnessing yet others of its proxies, Mr Beamish, who surprisingly suddenly became employed by

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FA6

Sent from my iPhone

Begin forwarded message:

From: "Travel Document" <itinerary@amadeus.com>
Date: 18 March 2016 at 10:07:53 AM SAST
To: BOBROFFRONALD@GMAIL.COM
Subject: BOBROFF/RONALD MR 19MAR2016 JNB PER

SOUTH AFRICAN AIRWAYS FLYSAAR S AFRICA BOOKING REF: 3D2TUN
AIRWAYS PARK, JONES ROAD DATE: 18 MARCH 2016
O.R. TAMBO INTERNATIONAL AIRPORT
JOHANNESBURG BOBROFF/RONALD MR
SOUTH AFRICA
TELEPHONE: 2711 978 1111
FAX: TBA

FLIGHT SA 280 - SOUTH AFRICAN AIRWAYS SAT 19 MARCH 2016

DEPARTURE: JOHANNESBURG, ZA (O.R. TAMBO INTL), TERMINAL B 19 MAR 21:00
ARRIVAL: PERTH, WA (PERTH), TERMINAL 1 20 MAR 12:20
FLIGHT BOOKING REF: SA/3D2TUN
RESERVATION CONFIRMED, BUSINESS (D) DURATION: 09:20

BAGGAGE ALLOWANCE: 2PC
MEAL: BREAKFAST/DINNER
NON STOP JOHANNESBURG TO PERTH, WA
OPERATED BY: SOUTH AFRICAN AIRWAYS, SA
AIRCRAFT OWNER: SOUTH AFRICAN AIRWAYS, SA
EQUIPMENT: AIRBUS INDUSTRIE A340-300

FLIGHT SA 7258 - SOUTH AFRICAN AIRWAYS SUN 20 MARCH 2016

DEPARTURE: PERTH, WA (PERTH), TERMINAL 1 20 MAR 15:05
ARRIVAL: SYDNEY, NS (KINGSFORD SMITH), TERMINAL 2 20 MAR 22:15
FLIGHT BOOKING REF: SA/3D2TUN

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RESERVATION CONFIRMED, BUSINESS (D)		DURATION:
BAGGAGE ALLOWANCE: 2PC		
MEAL: MEAL		
NON STOP	PERTH, WA TO SYDNEY, NS	
OPERATED BY:	VIRGIN AUSTRALIA INTL, VA 562	
AIRCRAFT OWNER:	VIRGIN AUSTRALIA INTL, VA	
EQUIPMENT:	AIRBUS INDUSTRIE A330-200	
FLIGHT	SA 7257 - SOUTH AFRICAN AIRWAYS	TUE 22 MARCH 2016
DEPARTURE:	SYDNEY, NS (KINGSFORD SMITH), TERMINAL 2	22 MAR 19:00
ARRIVAL:	PERTH, WA (PERTH), TERMINAL 1	22 MAR 21:05
FLIGHT BOOKING REF: SA/3D2TUN		
RESERVATION CONFIRMED, BUSINESS (D)		DURATION: 05:05
BAGGAGE ALLOWANCE: 2PC		
MEAL: MEAL		
NON STOP	SYDNEY, NS TO PERTH, WA	
OPERATED BY:	VIRGIN AUSTRALIA INTL, VA 569	
AIRCRAFT OWNER:	VIRGIN AUSTRALIA INTL, VA	
EQUIPMENT:	AIRBUS INDUSTRIE A330-200	
FLIGHT	SA 281 - SOUTH AFRICAN AIRWAYS	TUE 22 MARCH 2016
DEPARTURE:	PERTH, WA (PERTH), TERMINAL 1	22 MAR 23:45
ARRIVAL:	JOHANNESBURG, ZA (O.R. TAMBO INTL), TERMINAL A	23 MAR 04:30
FLIGHT BOOKING REF: SA/3D2TUN		
RESERVATION CONFIRMED, BUSINESS (D)		DURATION: 10:45
BAGGAGE ALLOWANCE: 2PC		
MEAL: BREAKFAST/DINNER		
NON STOP	PERTH, WA TO JOHANNESBURG	
OPERATED BY:	SOUTH AFRICAN AIRWAYS, SA	
AIRCRAFT OWNER:	SOUTH AFRICAN AIRWAYS, SA	
EQUIPMENT:	AIRBUS INDUSTRIE A340-300	
GENERAL INFORMATION		
CHECK YOUR TRIP ONLINE		
https://www.checkmytrip.com/CMTServlet?R=3D2TUN&L=US&N=BOBROFF		

Itinerary

Page 2

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FAJ

From: Sydney, NS Australia
 To: Perth, WA Australia
 Class: ECONOMY (B)
 Stops: Non-stop
 Status: Confirmed
 In flight service: Meal, Non-smoking

Airport: SYD - Kingsford Smith, Terminal 2
 Airport: PER - Perth Arpt, Terminal 1
 Baggage: ADULT 2PC
 Duration: 05:05
 Aircraft: Airbus Industrie A330-200

Vendor Locator: 3AL8TY

Service(s): Ticket Numbers (E-tickets) 0831692411037C3 - Confirmed
 BOBROFF/DARRENRODNEYMR: Vegetarian Vegan Meal - No action

E-ticket(s): BOBROFF/DARRENRODNEYMR: 083 1692 411037

FLIGHT Perth to Johannesburg (SA281) Tuesday, March 22 2016
 Date: March 22, 2016 (Tue)
 Airline: South African Airways
 Flight: SA281 (Operated by South African Airways)
 From: Perth, WA Australia
 To: Johannesburg, South Africa
 Class: ECONOMY (B)
 Stops: Non-stop
 Status: Confirmed
 In flight service: Dinner, Breakfast, Movie, Audio Programming, Duty Free Sales, Non-smoking, Short
 Feature Video

Vendor Locator: 3AL8TY

Service(s): Ticket Numbers (E-tickets) 0831692411037C4 - Confirmed
 BOBROFF/DARRENRODNEYMR: Vegetarian Vegan Meal - Confirmed

E-ticket(s): BOBROFF/DARRENRODNEYMR: 083 1692 411037

E-tickets

Airline	Ticket Number		Name		Issues		IATA Number						
083	083 1692 411037		BOBROFF/DARRENRODNEYMR		16MAR		77210593						
Coupon	USE	Airline	Flight	Class	Date	Orig	Desi	Time	Status	Fare	Basis	NVB	NVA
1	ARPT	SA	280	V	16MAR	JNB	PER	2100	OK	VLSP1Y		16MAR	16MAR
2	ARPT	SA	7258	V	17MAR	PER	SYD	1520	OK	VLSP1Y		17MAR	17MAR
3	ARPT	SA	7257	B	22MAR	SYD	PER	1900	OK	BSE1Y		22MAR	22MAR
4	ARPT	SA	281	B	22MAR	PER	JNB	2345	OK	BSE1Y		22MAR	22MAR

*** BON VOYAGE ***

08
PAG

Optus

21:57

+ 30%



+27 82007228163983

Text Message
Tue, 22 Mar, 2016

Hawks are waiting to
arrest wives at
07.30pm at Cassims
house.

61
FAG



Compose Reply Forward Message Settings Help

Justice for RBP's client - the voluntary return of Massrs Bobroff to SA

Justice4RBPClients <justice4rbpcclients@gmail.com>

To: Ronald Bobroff <bobroff@icon.co.za>, Ronald Bobroff <bobroffronald@gmail.com> <darrenbobroff@gmail.com>
Cc: Steven Bezuidenhout <steve.bez@mweb.co.za>, Mandy Bezuidenhout <mandy.bez@mweb.co.za>

Tue, Oct 18, 2016 at 8:17 PM
Darren Bobroff

Dear Ronald, Darren

It is in everyone's interest that you return to South Africa such that justice can be served to all role players to Ronald Bobroff & Partner's (RBP) past shenanigans.

Unfortunately 2 of the 3 directors of RBP fled South Africa to avoid arrest. This is delaying the justice process, which as lawyers I am sure you can understand. We want to avoid any further delays to get justice for RBP's clients (as if your clients did not suffer enough from their injuries);

It is in your personal interest to return to South Africa without delay, and we are prepared to give you grace till end November 2016 for both of you to return voluntarily. Should you decide not to return to South Africa and allow the SA legal system to run its course, there will be consequences for both you and your families.

These consequences could include:

1. God will be disappointed with you (and since you are religious men, this should be important to you and your families);
2. Your conscience will remain troubled well into your old age;
3. You will have further tarnished the reputation of the your profession. A profession that you proudly had represented at the various Law Societies
4. Your family, children and grand-children will suffer from the consequences of their fathers' misdeeds. On this aspect, we really do not want to harm your sons in Australia, and daughters in South Africa. However, should you do not return to SA by end November, you will be leaving us little choice. Any potential harm that could result from your inaction, would be as a direct result of your own doing (and you will need to live with a further burdened conscience)

Please could you make the necessary arrangement to return to South Africa by no later than end November 2016. Should you wish to discuss the matter with us (or you would like to put forward your side of the story), please let us know your contact details by return email.

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PA 10

Gmail - Justice for RBP's clients - voluntary return of Messrs Bobroff to SA

8/11/2016, 4:50 PM



Justice for RBP's clients - voluntary return of Messrs Bobroff to SA

Justice4RBPClients <justice4rbpcclients@gmail.com>
To: Ronald Bobroff <bobroffronald@gmail.com>, Ronald Bobroff <bobroff@icon.co.za>, Darren Bobroff <darrenbobroff@gmail.com>
Cc: Mandy Bezuidenhout <mandy.bez@mweb.co.za>, Steven Bezuidenhout <steve.bez@mweb.co.za>

Fri, Nov 4, 2016 at 12:34 AM

Dear Ronald, Darren,

We note that you have not responded to our initial email of 18 October, and have not attempted to provide your side of the story. The end of November deadline for your return to SA is approaching, and we really do not want to have to resort to getting your wives, children and grandchildren to suffer the consequences of their father's misdeeds. We understand that Elaine is back in SA in Victory Park ... , and we know where your family are staying in Sydney and we know where your kids go to school

Concerned citizens dismayed by the Bobroff shenanigans and their unethical exploitation of the weak over several years

Justice4RBPClients <justice4rbpcclients@gmail.com>
To: Ronald Bobroff <bobroffronald@gmail.com>, Ronald Bobroff <bobroff@icon.co.za>, Darren Bobroff <darrenbobroff@gmail.com>
Cc: Steven Bezuidenhout <steve.bez@mweb.co.za>, mandy.bez9180@gmail.com, Tony Beamish <tony@carteblanche.co.za>

Tue, Nov 8, 2016 at 2:57 AM

[Quoted text hidden]

63
FALL

Justice4RBPClients <justice4rbpcclients@gmail.com>

to Ronald, Ronald, me, Mandy, Steven

Nov 21 (10
days ago)

Dear Ronald, Darren,

We note that you have not responded to our emails of 18 October (or 3 November) to provide your side of the story.

It would be in your interests to take our emails with the necessary seriousness if you care for, and love your families. The end of November deadline for your return to SA is approaching, and we do not want to have to resort to getting your wives, children and grandchildren to suffer the consequences of their father's misdeeds.

Concerned citizens dismayed by the Bobroff's shenanigans and their unethical exploitation of the weak

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PAR

ATTORNEY
JOHN JOSEPH FINLAY CAMERON
HURLINGHAM OFFICE PARK, BLOCK G, GROUND FLOOR
CR. WILLIAM NICOL & REPUBLIC ROADS, SANDTON
(ENTRANCE IN WOODLANDS AVENUE)
P O Box 41248, Craighall, 2024
Tel: (002711) 285 0043 Fax: (002711) 325 4780
Cellular: 072 041 8818
E-mail: johncam@mweb.co.za

Our Ref: J Cameron/corr/AMD/Bobroff hearing
Date: 7 December 2016

AMD CONFERENCE SOLUTIONS
UNIT 7, NO 43, 5TH STREET
WYNBERG
SANDTON

TELEPHONE: 011 039 1012
TELEFAX : 086 552 3770
EMAIL: arond@amdsolutions.co.za

Dear Sirs

OUR CLIENT: MR RONALD BOBROFF
RE: VIDEO LINK CONFERENCING FACILITIES TO BE MADE AVAILABLE AT THE
HIGH COURT JOHANNESBURG ON MONDAY THE 12TH DECEMBER 2016 (10H00 –
12H00 AND ON TUESDAY THE 13TH DECEMBER 2016 (10H00 – 13H00) ("THE
FACILITIES")

We address this communication to you in regard to the Facilities and acknowledge receipt of your communication dated the 6th December 2016.

Our client's details are as follows:-

1. Email address: bobroffronald@gmail.com
2. Cellular No 0061 402 001583

In regard to the "testing" we request that you contact our client to arrange for a specific time (we suggest 12h00 on Friday the 9th December 2016) - the writer will attend at your premises when this testing takes place – we understand that this will take place a premises in Bryanston and if so we require that address.

You are requested to acknowledge receipt hereof and we await your advices hereto.

Yours faithfully

John Cameron