

## NOTES IN ANSWER TO STRIKE-OUT APPLICATION

This answer follows the paragraph numbering of LASA's notice of application.

1. Ad FA paras 29-30: The objection is answered and refuted in RA p 273, para 192. Certainly 'the integrity of the Judge President of the Gauteng Division' is challenged in my eight complaints to the JSC, two of which charge documented crimes: subornation of perjury, and lying and false reporting to the Justice Portfolio Committee of the National Assembly. RA para 179 deals with section 15(2)(d) of the JSC Act, which mandates that summary dismissal of any complaint that is 'frivolous or lacking in substance'. In telling contradistinction, Mlambo JP was required to answer my complaints.
2. Ad FA para 31: It's not 'hearsay'; Mlambo JP's misconduct is (i) documented, and the documents – authored by him, authorised by him, or copied to him – are put up in support of my eight capital complaints against him to the Judicial Service Commission, currently the subject of a serious misconduct investigation by its Judicial Conduct Committee, as recorded stated in RA para 1.11. Nor is it 'irrelevant material': Mlambo JP's misconduct in colluding in and conniving at Vedalankar's illegal refusals of my first two PAIA requests of 2010, and his false reporting about this to the Minister and to the Portfolio Committee to pervert their separate enquiries into this, is an important part of factual background of LASA's persistent illegal and unconstitutional refusal since 2010 to comply with my PAIA requests and its concealment of this with false reporting; and it's relevant to my case for

orders for publication and notification of the Minister, the Portfolio Committee, and the SAHRC.

3. Ad FA para 32: No prejudice arises from my vouching to court that I indeed delivered my Special Report (FA annexure 'F') to the SAHRC.
  4. Ad 33-34: This is relevant to showing the SAHRC's dereliction of its mandate imposed by section 83.
- 5-10. Etc, etc, more of the same old.

WHERE IN THE ANSWERING AFFIDAVIT, LASA REPEATEDLY INDICATES ITS INTENTION TO APPLY TO STRIKE OUT, I REFUTE ITS CASE ON EACH OCCASION IN MY REPLYING AFFIDAVIT.