
**RECUSAL APPLICATIONS FOR JUSTICE S.
KHAMPEPE –INDEX**

ITEM	DESCRIPTION	PAGINATED PAGES
BUNDLE A: FORMER PRESIDENT MR. J.G ZUMA		
1.	Notice of application	1 to 3
2.	Founding Affidavit: Application for Recusal deposed to by the Former President Mr. J.G Zuma	4 to 18
3.	Annexure “A” – Letter from the Commission to KNMS Inc. on notice 3.3 dated Former President Mr. J.G. Zuma dated 3 December 2025	19 to 21
4.	Annexure “B” – Letter from KNMS Inc to the Commission Re: Notice 3.3 Former President Mr. J.G. Zuma dated 3 December 2025	22 to 26
5.	Annexure “C” – Extension of completion date for Khampepe Commission	27 to 28
6.	Annexure “D” – Notice in terms of Rule 3.3 to Former President Mr. J.G Zuma	29 to 63
7.	Annexure “E” – Letter from KMNS to the Commission: Response to issued notice of rule 3.3 to Former President Mr. J.G Zuma dated 11 December 2025	64 to 66
8.	Annexure “F” – Letter from the Secretary of the Commission to KMNS Inc Re: Former President Mr. J.G Zuma// Recusal Application dated 11 December 2025	67 to 69
9.	Filing sheet- Replying affidavit deposed to by the Former President Mr. J.G Zuma	70 to 71
10.	Repling affidavit deposed by the Former President Mr. J.G Zuma	72 to 87

ITEM	DESCRIPTION	PAGINATED PAGES
BUNDLE B: EVIDENCE LEADERS ANSWERING AFFIDAVIT TO FORMER PRESIDENT MR. J.G ZUMA		
1.	Answering affidavit: Application for the recusal of the Chairperson	1 to 24
2.	Annexure “A” – Letter from KMNS to the Commission Re: Notice 3.3 Former President Mr. J.G. Zuma dated 02 October 2025	25 to 26
3.	Annexure “B” – Letter from the Commission to KMNS Re: Notice 3.3 Former President Mr. J.G. Zuma dated 03 October 2025	27
4.	Annexure “C” – Letter from KMNS to the Commission Re: Notice 3.3 Former President Mr. J.G. Zuma dated 14 November 2025	28

ITEM	DESCRIPTION	PAGINATED PAGES
BUNDLE C: CALATA GROUP ANSWERING AFFIDAVIT TO FORMER PRESIDENT MR. J.G ZUMA		
1.	Answering Affidavit to Former President J.G Zuma application of recusal	1 to 14

ITEM	DESCRIPTION	PAGINATED PAGES
BUNDLE D: FORMER PRESIDENT MR. T. MBEKI AND OTHERS		
1.	Notice of application	1 to 2
2.	Founding Affidavit: Application for Recusal deposed to by the Former President Mr. T. Mbeki	3 to 24
3.	Annexure “ TMM1 ” – Letter from KMNS to the Commission Re: notice in terms of rule 3.3 dated 03 December 2025	25 to 29
4.	Annexure “ TMM2 ” – Appointment of Justice Khampepe as Justice Khampepe as TRC Commissioner 15 December 1995	30 to 31
5.	Annexure “ TMM3 ” – Justice Khampepe appointment as member of the TRC Amnesty Commission 31 March 2001	32 to 33
6.	Annexure “ TMM4 ” – TRC volume 5 report	34 to 36
7.	Annexure “ TMM5.1 ” – Letter from Webber Wentzel to the Commission: Potential further conflicts and request for clarity on procedure going forward dated 11 November 2025	37 to 39
8.	Annexure “ TMM5.2 ” – Founding affidavit of L. Calata	40 to 88
9.	Annexure “ TMM 6 ” – Evidence Leader’s submission to the objection to witnesses being led by their legal representatives to present their evidence	89 to 136
10.	Annexure “ TMM7 ” – Letter from Webber Wentzel to the Commission: Position of the evidence leaders vis-à-vis certain aspects of the evidence dated 18 September 2025	137 to 138
11.	Annexure “ TMM8 ” – Letter from the Commission to Webber Wentzel: Position of the evidence leaders vis-à-vis certain aspects of the evidence dated 19 September 2025	139 to 140
12.	Annexure “ TMM9 ” – Ruling dated 02 December 2025	141
13.	Annexure “ TMM10 ” – Founding affidavit: National Prosecuting Authority application for recusal	142 to 147

ITEM	DESCRIPTION	PAGINATED PAGES
14.	Annexure “ TMM11 ” – Email from L. Dzedze (Boqwana Burns Inc) to the Commission requesting for the Chairperson’s reasons for ruling dated 03 December 2025	148 to 149
15.	Annexure “ TMM12 ” – Letter from the Commission to Boqwana Burns INC: Ruling objections dated 03 December 2025	150
16.	Confirmatory affidavit: Ms. B. Mabandla	151 to 152
17.	Confirmatory affidavit: Mr. R. Kasrils	153 to 154
18.	Confirmatory affidavit: Ms. T. Didiza	155 to 156
19.	Confirmatory affidavit: Mr. C. Nqakula	157 to 158
20.	Filing sheet- Replying affidavit deposed by Former President T. Mbeki and others to the Chairperson’s answering affidavit	159 to 160
21.	Replies affidavit deposed to by the Former President Mr. T. Mbeki and others to the Chairperson’s answering affidavit	161 to 200
22.	Annexure “ TMM1 ” – Letter from Boqwana Burns Inc. to the Commission Re: Notice in terms of Rule 3.3 Request for documents dated 24 October 2025	201 to 205
23.	Annexure “ TMM2 ” – Letter from Boqwana Burns Inc. to the Commission Re: Notice in terms of Rule 3.3 Request for documents dated 03 November 2025	206 to 209
24.	Annexure “ TMM3 ” – Letter from Boqwana Burns Inc. to the Commission Re: Witness statements implicating our clients dated 07 November 2025	210 to 213
25.	Annexure “ TMM4 ” – Letter from Boqwana Burns Inc. to the Commission Re: Witness statements implicating witnesses dated 09 December 2025	214 to 224
26.	Annexure “ TMM5 ” – Letter from the Commission to Boqwana Burns Re: filing lists of witnesses and submissions on implicated persons by Calata and twenty-five others dated 07 November 2025	225

ITEM	DESCRIPTION	PAGINATED PAGES
27.	Annexure “ TMM6 ” – Letter from Webber Wentzel to the Commission Re: Letter to Boqwana Burns	226 to 228
28.	Confirmatory affidavit: Ms. B. Mabandla	228(a)
29.	Confirmatory affidavit: Mr. R. Kasrils	228(b)
30.	Confirmatory affidavit: Ms. T. Didiza	228(c)
31	Confirmatory affidavit: Mr. C. Nqakula	228(d)
32.	Filing sheet- Replying affidavit deposed by Former President T. Mbeki and others in response to the Calata group	229 to 230
33.	Replying affidavit deposed to by the Former President Mr. T. Mbeki and others in response to the Calata group	231 to 285
34.	Confirmatory affidavit: Ms. B. Mabandla	286 to 287
35.	Confirmatory affidavit: Mr. R. Kasrils	288 to 289
36.	Confirmatory affidavit: Ms. T. Didiza	290 to 291
37.	Confirmatory affidavit: Mr. C. Nqakula	292 to 293
38.	Condonation application: Replying affidavits	294 to 305

ITEM	DESCRIPTION	PAGINATED PAGES
BUNDLE E: EVIDENCE LEADERS ANSWERING AFFIDAVIT TO FORMER PRESIDENT MR. T. MBEKI AND OTHERS		
1.	Answering Affidavit: Application for Recusal of the Chairperson	1 to 28
2.	Annexure “ SC1 ” – Letter from Boqwana Burns Inc to the Commission: Witness statements implicating our clients dated 9 December 2025	29 to 39
3.	Annexure “ SC2 ” – Letter: Notice of rule 3.3 to Former President Mr. T. Mbeki	40 to 157
4.	Annexure “ SC3 ” – Letter: Notice of rule 3.3 to Ms. B. Mabandla	158 to 180
5.	Annexure “ SC4 ” – Letter: Notice of rule 3.3 to Ms. T. Didiza	181 to 188
6.	Annexure “ SC5 ” – Letter: Notice of rule 3.3 to Mr. R. Kasrils	189 to 208
7.	Annexure “ SC6 ” – Email from A. Frense to the Commission: response to notice of rule 3.3 to Mr. R. Kasrils dated 09 October 2025	209
8.	Annexure “ SC7 ” – Letter from KMNS INC to the Commission: response to notice in terms of rule 3.3 Former President Mr. J.G Zuma dated 02 October 2025	210 to 211
9.	Annexure “ SC8 ” – Letter from Boqwana Burns Inc to the Commission: response to notice in terms of rule 3.3- Former President Mr. T. Mbeki, Ms. B. Mabandla, Ms. T. Didiza dated 06 October 2025	212 to 213
10.	Annexure “ SC9 ” – Email from Mr. R. Kasrils to the Commission: response to notice in terms of rule 3.3 to Mr. R. Kasrils dated 14 October 2025	214
11.	Annexure “ SC10 ” – Letter from Boqwana Burns Inc to the Commission: Notice in terms of rule 3.3 dated 14 October 2025	215 to 216

12.	Annexure “ SC11 ” – Email from L. Dzedze (Boqwana Burns Inc) to the Commission: Pre-Inquiry meeting confirmation dated 17 October 2025	217
13.	Annexure “ SC12 ” – Letter from Boqwana Burns Inc to the Commission: Notice in terms of rule 3.3 Mr. C. Nqakula dated 21 October 2025	218
14.	Annexure “ SC13 ” – Letter: Notice in terms of rule 3.3 Mr. C. Nqakula dated 20 October 2025	219 to 241
15.	Annexure “ SC14 ” – Letter from Boqwana Burns to the Commission: Notice in terms of rule 3.3- request for documents dated 24 October 2025	242 to 246
16.	Annexure “ SC15 ” – Email from Mr. L. Dzedze (Boqwana Burns Inc) to the Commission, request for the correspondence: Webber Wentzel dated 28 October 2025	247
17.	Annexure “ SC16 ” – Email from Mr. L. Dzedze (Boqwana Burns Inc) to the Commission, Re: filing lists of witnesses and submissions on implicated person for Calata and twenty-five others dated 28 October 2025	248
18.	Annexure “ SC17 ” – Letter from Boqwana Burns to the Commission: Notice in terms of rule 3.3- request for documents dated 03 November 2025	249 to 252
19.	Annexure “ SC18 ” – Letter from Boqwana Burns to the Commission: Witness statements implicating our clients dated 09 December 2025	253 to 263

ITEM	DESCRIPTION	PAGINATED PAGES
BUNDLE F: CALATA GROUP ANSWERING AFFIDAVIT TO FORMER PRESIDENT MR. T MBEKI AND OTHERS		
1.	Answering Affidavit to Former President T. Mbeki application of recusal	1 to 25
2.	Annexure "A" The first and last page of the amnesty decision in AC/99/0350	26 to 27
3.	Annexure "B" A copy of page 212 of Vol 5, Ch 6 of the TRC report	28

ITEM	DESCRIPTION	PAGINATED PAGES
BUNDLE G: PARTIES' HEADS OF ARGUMENTS		
1.	Bundle G1 Heads of argument: Former President J.G Zuma	1 to 24
2.	Bundle G2 Heads of argument: Commission: Evidence Leaders	1 to 39
3.	Bundle G3 Heads of arguments: Calata Group and Others	1 to 24
4.	Bundle G4 Heads of argument: Former President T.M. Mbeki	1 to 40