

**Calata & Others v Government of RSA & Others, Case No.: 2025-005245**

**Documents not attached to Founding Affidavit, to be made available on request**

No.	Document / Source Material	Paragraph reference
1.	<i>Calata and Others v National Director of Public Prosecutions and Others</i> , Case Number: 35447/2021	17
2.	List disclosing 81 convicted persons recommended for pardon under former President Thabo Mbeki's Special Dispensation for Political Pardons	89.1 & 89.2
3.	<i>S v Basson</i> (CCT30/03A) [2005] ZACC 10	90
4.	<i>Nkadimeng v NDPP and Others</i> , case no 35554/2015	96.2 & 173
5.	Ole Bubenzer, "Post-TRC Prosecutions in South Africa" (book)	104
6.	Correspondence and underlying documentation regarding "Lack of delivery"	113
7.	Correspondence between legal teams, NPA and Minister of Justice around reopened inquests of Ahmed Timol, Neil Aggett, Hoosen Haffejee and Imam Haron	115.8
8.	Comparative materials on Chile/Argentina/Peru	118 & 119
9.	Documentary on Al Jazeera titled "My Father Died For This"	121
10.	NPA Annual Report of 2005/06	204
11.	Correspondence from Frank Dutton (on behalf of the Foundation for Human Rights) to the South African Police Service concerning the appointment of investigators to TRC cases	218
12.	High Court application papers instituted by Thembi Nkadimeng and others challenging amendments to the National Prosecuting Authority Prosecution Policy	252
13.	Ginwala Commission of Inquiry Report dated 4 November 2008.	282
14.	NPA Annual Report 2008/09	287
15.	Court papers in <i>CSV and Others v The President</i> concerning the presidential pardons process (Case No. 15320/09).	298
16.	NPA Annual Report 2009/10	319
17.	Dutton's presentation to the NDPP (19 January 2016)	346
18.	Correspondence from Webber Wentzel (on behalf of the Timol family) to the National Prosecuting Authority concerning the reopening of the Timol inquest (June–August 2016).	347
19.	Judgment in re-opened inquest into the death of Ahmed Essop Timol (IQ01/2017) [2017] ZAGPPHC 652	348

20.	Criminal indictment charging João Rodrigues with murder and obstruction of the course of justice arising from the Timol inquest (30 July 2018).	351
21.	Court papers in the application for a permanent stay of prosecution in <i>S v Rodrigues</i>	352
22.	NPA Annual Report of 2012/2013	410
23.	Correspondence concerning the Richard Motasi matter and related TRC investigations.	414.2
24.	Parliamentary address by former Minister of Justice, Ronald Lamola, on the Budget Vote Debate of the Department of Justice and Constitutional Development (16 July 2019).	418
25.	Submissions by the Timol Family	426
26.	Correspondence from Aggett's attorneys to the NPA (2016 – 2019)	428
27.	Family's closing submissions in the Haffejee reopened inquest.	428.4
28.	Family's closing submissions in the Aggett reopened inquest.	428.7
29.	Chronology attached to the application in Case No. 35447/2021 detailing communications and document submissions to support the investigation.	438
30.	Letters addressed to the NPA concerning the missing Cradock Four docket (September 2019 – August 2020).	439
31.	Letter to Minister of Police and National Commissioner of the Police, dated 4 October 2020.	441
32.	Letters placing the NPA and DPCI on terms to finalise the investigation into the missing Cradock Four docket.	441.2
33.	Court application and related correspondence concerning the review of the missing Cradock Four docket investigation.	442
34.	Legal opinion by the Foundation for Human Rights titled ' <i>Exploring Legal Options for the Establishment of a Special Capacity to Investigate &amp; Prosecute Apartheid Crimes</i> '.	452
35.	Correspondence from family representatives to the NPA regarding the referral of TRC cases to inquests.	459.1
36.	PowerPoint presentation by the National Prosecuting Authority on the status of TRC cases, presented on 17 September 2024.	479
37.	Calata representations to the Zondo Commission.	486
38.	Calata affidavit submitted to the Zondo Commission (August 2020).	491
39.	Chronology submitted to the Zondo Commission.	491
40.	Recording of lecture delivered by the Minister of Justice regarding the appointment and terms of reference of an inquiry	504
41.	Ntsebeza Report released by the National Prosecuting Authority (15 February 2024).	518