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Our Ref: BP/M00093

17 February 2026

Your Ref: Mr. Kwinana/Ms. Sibyla/Ms. Mbana

**Kwinana Mabuza Nkome Inc**  
43 Wierda Rd W, Wierda Valley  
Sandton  
2196

Per email: [thabo@kmnsinc.co.za](mailto:thabo@kmnsinc.co.za), [busisiwe@kmnsinc.co.za](mailto:busisiwe@kmnsinc.co.za),  
[zukiswa@kmnsinc.co.za](mailto:zukiswa@kmnsinc.co.za)

Dear Sir / Madam

**RE: ZUMA // THE CHAIRPERSON OF THE COMMISSION AND OTHERS (CASE NO: 2026-026936)**

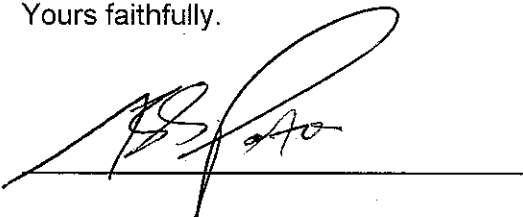
1. We refer to the above matter and confirm that we act for, and on behalf of, the first to fifth respondents.
2. We confirm receipt of the applicant's notice of motion, founding affidavit and the annexures thereto. Having perused the papers, we consider it necessary to address certain preliminary issues arising from the procedural sequencing contemplated in the notice of motion.
3. As you are aware, Rule 53 of the Uniform Rules affords your client the opportunity to supplement his founding papers after receipt of the record of the impugned decision.

**Directors:** Theophilus N Seanego BProc, LL.M (Corporate Law), Thembekile Graham LL.B, Buntu Pato LL.B. **Senior Associates:** Nqubeko Makhanya LL.B, Sphelele Nxumalo LL.B, LL.M (Labour Law), (Conveyancer and Notary Public), Nafeesa Patel LL.B, LL.M (International Commercial Law). **Associate:** Nonhlanhla Gumede LL.B. **Candidate Attorneys:** Kenneth Lathane LL.B, Patrick Vilakazi LL.B, Gomotsegang Mosupye LL.B, LL.M (Public Law and Legal Philosophy), Dineo Mathabathe LL.B, Mutshidzi Mabirimisa BA. Psych, LL.B, Keabetswe Phehle LL.B, Kafuoa Mosala LL.B, Sinethemba Makau B.Com Law, LL.B.

**MIDRAND | DURBAN**

4. The record having been delivered on 13 February 2026, the notice of motion contemplates that the time period for such supplementation will expire on 20 February 2026.
5. However, the notice of motion also requires that any answering affidavits be delivered by 20 February 2026, being the date by which the applicant's supplementary founding affidavit is due.
6. The proposed timeline for the delivery of affidavits is procedurally irregular insofar as it requires the delivery of the answering affidavit(s) in the absence of any opportunity to consider the content of any supplemented founding affidavit and, indeed, the true extent of the applicant's case.
7. To avoid the procedural issues invited by the sequencing currently set out in the notice of motion, we propose that our clients deliver the answering affidavit on or before 6 March 2026, being 10 days after the expiry of the period in which the applicant is entitled to supplement the founding affidavit in accordance with Rule 53.
8. The applicant may then deliver the replying affidavit within five days thereafter.
9. Kindly confirm your client's agreement to the above.

Yours faithfully.



**SEANEGO ATTORNEYS INC.**