

IN THE TRUTH AND RECONCILIATION COMMISSION OF INQUIRY

In re:

JEFFREY THAMSANQA RADEBE

Applicant

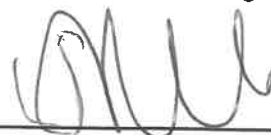
NOTICE OF MOTION

KINDLY TAKE NOTICE the applicant makes the application to the Chairperson of the Commission for a ruling that:

1. Advocate W.R. Mokhare SC and Advocate Reuben Maphutha are granted leave to lead Mr Jeffrey Thamsanqa Radebe in his evidence before the Commission on 31 July 2026 or any other day determined by the Commission thereafter.

TAKE FURTHER NOTICE THAT the application is supported by the accompanying affidavit of Sipho Mathebula annexed hereto.

DATED at PRETORIA on this 10th day of JULY 2026.



STATE ATTORNEY

Applicant's Attorneys

SALU Building

316 Thabo Sehume Street

Private Bag X 91

Pretoria

Tel: 012 309 1627

Ref: Mr Sipho Mathebula

Email: SiMathebula@justice.gov.za

TO:

THE CHAIRPERSON

C/O SECRETARY OF THE COMMISSION

THE TRC COMMISSION

JOHANNESBURG

BY EMAIL

IN THE TRUTH AND RECONCILIATION COMMISSION OF INQUIRY

In re:

JEFFREY THAMSANQA RADEBE

Applicant

SUPPORTING AFFIDAVIT

I, the undersigned,

SIPHO MATHEBULA

do hereby make oath and say:

1. I am an adult male employed as such by the Office of the State Attorney Pretoria as senior assistant State Attorney. I am authorised to make this application on behalf of the applicant for leave for the applicant to be led by Advocate W.R. Mokhare SC assisted by junior counsel when the applicant gives evidence on 31 July 2026 before the Commission.
2. The facts deposed to herein are within my knowledge save where the contrary appears from the context and are true.
3. This application is brought in terms of Rule 3.1 of the TRC Inquiry Rules, which provides that witnesses appearing before the Commission may be represented by legal counsel, subject to the approval of the Chairperson.

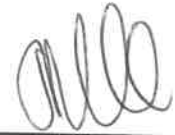
NR
SP

4. As stated above the purpose of this application is to ask leave of the Chairperson to permit the appointed counsel who represents the applicant in this upcoming hearing of 31 July 2026 to lead the applicant in his evidence that he will be presenting before the Commission. This will expedite the presentation of the evidence and assist the Commission as well as the evidence leaders in their work, thus obviating the necessity of the evidence leaders having to consult with the applicant and take down his statement. This time can be allocated to other pressing matters the evidence leaders are required to attend to as well.
5. The applicant has already submitted his first affidavit to the commission in March 2026 and subsequently requested the State Attorney to represent him and appoint senior counsel on his behalf. The appointment of senior counsel resulted in consultation with the applicant and the preparation of the second sworn statement by the applicant.
6. It was agreed between counsel for the applicant and the evidence leaders that the applicant's sworn statement will be submitted to the commission on 10 July 2026 together with the application for leave to lead him in evidence.
7. The applicant has been invited to give evidence on 31 July 2026 on matters relevant to the time when he was the Minister of Justice and Constitutional Development between the period 2009 until 2024 and his role if any in

NR

50

respect of exercising final responsibility over the National Prosecuting Authority.



DEPONENT

SIGNED and SWORN before me at PRETORIA on this 10 day of JULY 2026. The deponent having sworn that the content of this affidavit is both true and correct acknowledged that She knows and understands the contents of this affidavit, that She has no objection to taking the prescribed oath, and that She considers the prescribed oath to be binding on her conscience, having complied with the applicable regulations.



COMMISSIONER OF OATHS

NYIKO RONALD BALOYI
COMMISSIONER OF OATHS EX OFFICIO
PRACTISING ATTORNEY
PRETORIA, RSA
CELL: 078 226 2896
FAX: 086 666 1436
Email: ronaldn@mailbox.co.za

