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Our ref. D Eloff/AF0108H

Your ref:

30 July 2018

Mr JJ Mlotshwa
Deputy Director of Public Prosecutions
Priority Crimes Litigation Unit
Office of the National Director of Public Prosecutions
Pretoria
Telephone: (12) [REDACTED]
Cellphone: [REDACTED]
Rightfax: (012) [REDACTED]
E-mail: jjmlotshwa@npa.gov.za

Dear Mr Mlotshwa,

**RE: STATE // PAUL O'SULLIVAN AND MELISSA NAIDU AT PALM RIDGE
MAGISTRATES COURT CAS 799/11/2011**

1. The abovementioned matter refers.
2. We are instructed to address you in respect of the following matters:
 - 2.1. We confirm that notice was given on 11 June 2018 at the previous appearance that our client we will be bringing an application from the bar, on 1 August 2018, if the matter is not ready to proceed, as is clear from the prior six appearances, which have wasted a lot of our client's time and resources.

- 2.2. We record that in a previous matter at the Randburg Magistrate Court (Case Number RC326/16), the matter was dragged out by at least a year longer than necessary, with delay tactics, by bringing an application for review, which was subsequently abandoned the day before the matter was due to be heard. This also wasted a considerable amount of time and resources of our client.
- 2.3. Further in respect of the above mentioned matter in the Randburg court prosecution was halted through a Section 6(b) certificate which was handed to us and the Court on 29 June 2018. This despite the fact that the notice was signed a week prior to the matter being heard. We expected it to be a matter of courtesy to inform our client that prosecution was due to be halted. This would have avoided counsel for our client preparing for trial and setting down the days to appear on behalf of our client. This resulted in further wasted costs and time for our client.
- 2.4. You are invited to advise whether or not you are ready to proceed next Wednesday 1 August 2018 and will continue through to Friday 3 August 2018, so that we can properly instruct counsel and avoid further wasted costs, which we are instructed will be laid at your door, should you cause same.
- 2.5. Finally, we have been instructed to issue a subpoena for yourself and Warrant Officer Vlok, to testify in our client's defence, concerning the disposition of the docket that was stolen from Alberton Police station and replaced with a fake docket.
- 2.6. Kindly advise us of an address for service on Warrant Officer, Vlok, failing which we will be obliged to serve it on you.
3. We await your soonest response.
4. Our client's rights are reserved.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'D Spies'. The signature is stylized with a large 'D' and a cursive 'Spies'.

HURTER SPIES INC
PP WD Spies

AND TO:

Dr J.P. Pretorius
By email: jppretorius@npa.gov.za
Deputy Director of Public Prosecutions
Priority Crimes Litigation Unit
Office of the National Director of Public Prosecutions
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