

**IN THE EQUALITY COURT OF SOUTH AFRICA
(GAUTENG DIVISION, PRETORIA)**

Case No: 90405/18

In the matter between

SOUTH AFRICAN NATIONAL EDITORS' FORUM First Complainant

NAVARANJENI MUNUSAMY Second Complainant

PAULI VAN WYK Third Complainant

ADRIAAN JURGENS BASSON Fourth Complainant

MAX DU PREEZ Fifth Complainant

BARRY BATEMAN Sixth Complainant

and

THE ECONOMIC FREEDOM FIGHTERS First Respondent

JULIUS SELLO MALEMA Second Respondent

REPLYING AFFIDAVIT - NAVARANJENI MUNUSAMY

I, the undersigned,

NAVARANJENI MUNUSAMY

state the following under oath:

1. I am the second complainant in this matter.

2. Except where the context clearly indicates otherwise, the facts contained in this affidavit are within my personal knowledge, and are, to the best of my belief, both true and correct.
3. I deposed to a supporting affidavit in this matter.
4. I have read the answering affidavit of Mr Julius Sello Malema, deposed to on his own behalf (as first respondent) and on behalf of the Economic Freedom Fighters (as second respondent).
5. I have also read the replying affidavit of Ms Mahlatse Mahlase, deposed to on behalf of the South African National Editors' Forum (as first complainant). I confirm that the contents of Ms Mahlase's replying affidavit are true and correct in so far as they relate to me.
6. I wish to make the following additional statements in reply to Mr Malema's affidavit:
 - 6.1. The purpose of my affidavit in the founding papers is to give the Court my personal account of the abuse and harassment I experienced as a result of the public utterances of the respondents and to describe the impact it has had on me.
 - 6.2. I stand by the truth of those submissions. I shared those details at great risk to my own personal and professional reputation. I have no reason to fabricate the effects of the attacks on me.
 - 6.3. As a result of the harassment and abuse, which I maintain is a result of the respondents' conduct, I have taken steps which I felt necessary for

my personal safety. This includes relocating to a new neighbourhood, not attending any of the respondents' media events during the election cycle, and not contacting the respondents for interviews or comments.

- 6.4. I deny that I deliberately failed to disclose my previous involvement in, for example, the Friends of Jacob Zuma group, or my role as an advisor to the Minister of Higher Education and Training. I did not consider these matters relevant to the present proceedings, but since the respondents have raised them, I feel compelled briefly to address some of them.
- 6.5. My previous involvement as an advisor to the Minister of Higher Education and Training is not unusual or sinister. It is common practice worldwide for journalists to outsource and to use their communication and public relations knowledge and experience in the private and public sectors.
- 6.6. My work with the Friends of Jacob Zuma group was limited to running a website for a while, as an unpaid volunteer.
- 6.7. The suggestion that I "lobbied" for Mr Gordhan to become president is ridiculous. Mr Dali Mpofu has not disputed my recollection of events that Mr Gordhan's name was mentioned in jest in the context of our conversation. There was and can be no suggestion that I in any way "lobbied" for Mr Gordhan to become president.
- 6.8. Mr Malema's branding of me as a politician is illogical and not based on any reasonable fact. I have never served in any political office or been

associated with any political position. My work has always been in the field of journalism and communications, which was my field of study and for which I obtained a National Diploma in Journalism.

7. To the extent that I have not dealt specifically with any allegation concerning me in Mr Malema's affidavit, and where such allegations are inconsistent with my supporting affidavit or this affidavit, those allegations are denied.
8. I confirm again that I align myself with the contents of the complaint and that I support the relief sought by the other complainants.
9. I persist in asking this Court to grant the relief as set out in the Form to which my supporting affidavit is annexed.

DEPONENT

I certify that the deponent:

- (a) has acknowledged that she knows and understands the contents of this declaration; and
- (b) that she has no objection to taking the prescribed oath, that she considers the oath binding on her conscience and has in due form sworn that the contents of this declaration are true and has signed the same.

Before me at on this day of July 2019

COMMISSIONER OF OATHS