

Your reference: MAT

Our reference: PAVDR/ka/ W

25 August 2022

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Abrahams Kiewitz Inc.  
6<sup>th</sup> Floor Imperial Terraces  
Tyger Waterfront  
Carl Cronje Drive  
Tygervalley  
Bellville  
7535

By Email: [deyna@ak.law.za](mailto:deyna@ak.law.za)

Dear Sirs

**RE: GROUNDUP NPC AND NATHAN GEFFEN//INDEPENDENT NEWSPAPERS PROPRIETARY LIMITED AND OTHERS**

We represent GroundUp NPC and Nathan Geffen.

We are instructed to respond to your letter of 24 August 2022, received by our clients on 25 August 2022.

Our instructions are:

1. Our clients will not publish the apology in Daily Maverick, or otherwise, called for in paragraph 7 of your letter, for following reasons:
  - 1.1. First, our clients maintain that the publication of the article complained of (“the article”) was legally and ethically justified. Accordingly, our clients are not contrite, nor is contrition required in the circumstances.
  - 1.2. Second, our clients have no influence or control over the content of Daily Maverick. The article was first published by GroundUp, and Daily Maverick independently chose to republish it.

2. Our clients have noted the invitation extended in paragraph 10 of your letter to provide their grounds of justification for the publication. Apart from these being self-evident, as your clients are seemingly intent on proceeding so seek relief in court, our clients shall plead in the appropriate forum.
3. In light of the above, the remainder of the allegations in your letter are not addressed. Our omission is not an admission of such allegations by our clients.
4. Lastly, please note that the publisher of GroundUp is GroundUp NPC, of Suite 08, First Floor, South Block, Tannery Park, 23A Belmont Road, Rondebosch, Cape Town. Both our clients use this address.

Yours faithfully

**Lionel Murray Schwormstedt  
& Louw**

Per:

**P.A. VAN DER RIET**

This letter has been sent electronically  
and is not signed by the writer