

including the principles articulated in *Law Society of the Northern Provinces v Bobroff and Others* and *Kekana v Society of Advocates of SA*.

1.2 The applicant's founding affidavit was materially dishonest and misleading for the following reasons:

1.2.1 **Failure to disclose legal proceedings and disciplinary complaints:** The applicant alleged that no disciplinary proceedings or civil/administrative judgments had been instituted or were pending against her. This was patently false, as disciplinary complaints and three civil lawsuits brought by the Intervening Party were pending against her.

1.2.2 **Deliberate concealment of pertinent information:** The applicant's carefully worded affidavit concealed information about the pending complaints and lawsuits, which she had a duty to disclose upfront in a "full and frank disclosure". She only addressed these issues after they were brought to the court's attention by the Intervening Party. An appeal court will find that this deliberate and deceptive non-disclosure does not meet the "fit and proper" test for admission as a legal practitioner.

1.2.3 **Failure to disclose the "Justice Brand" issue:** The applicant failed to disclose her admitted attempt to "dig up dirt" on a retired Supreme Court of Appeal Justice, Fritz Brand. This act, which undermines the very judiciary she seeks to join, is a material fact that should have been disclosed in her founding affidavit, as it unfavourably influences her application. Her failure to do so was dishonest and constitutes a lack of integrity.

2. The Honourable Judges materially misdirected themselves by admitting the applicant despite her failure to comply with the statutory requirements for practical vocational training.

2.1 The court failed to consider that the applicant did not meet the requirements of Regulation 6(1)(b) of the Regulations under the Legal

Practice Act, which governs the reduction of the Practical Vocational Training Contract (PVTC) period from 24 to 12 months for those who attend a structured course.

2.1.1 The applicant completed her Law School course between January and June 2018. She was conferred with her LLB degree in June 2021 and only entered into her PVTC on 8 August 2022.

2.1.2 The Legal Practice Act (LPA) requires a person to complete all LLB degree requirements *before* serving under a PVTC. While Regulation 6(1)(b) allows for the completion of the Law School course prior to the PVTC, it does not prescribe that the course can be completed *before* obtaining an LLB degree.

2.1.3 The applicant's purported compliance with Regulation 6(2) of the LPA is misplaced, as that regulation applies to individuals who complete their course *after* entering into their PVTC. The applicant attended Law School prior to her PVTC.

2.1.4 This material non-compliance with the regulations should have precluded her admission, regardless of the court's view on her character.

3. The Honourable Judges materially misdirected themselves by disregarding the comments made by the Honourable Mr. Justice Vally.

3.1 The court failed to take into account the serious comments made by Mr Justice Vally during the proceedings on 8 February 2024, when he and Mr Acting Justice Mkhabela (as he then was) removed the applicant's matter from the roll.

3.1.1 Justice Vally noted serious problems with the application, stating there was "no ways she was going to be admitted by this court; absolutely no ways".

3.1.2 The comments were made in relation to the applicant's involvement with individuals who had been found to be "scoundrel[s]" by the Gauteng Court, and who had

misappropriated RAF monies. Justice Vally also questioned the applicant's ethical duties before her admission.

3.1.3 These judicial comments, based on the court's assessment of the papers, were a material factor that should have been considered in determining the applicant's fitness and propriety.

4. The Honourable Judges materially misdirected themselves by issuing a "sanitised" court order that failed to reflect the true nature of the proceedings.

4.1 The court acquiesced to a request to issue an order that omitted the names of the Intervening Party and the Interested Party. This was a material misdirection because court orders are public documents that inform and bind third parties, who are entitled to know the true nature of the proceedings. This resulted in an "inchoate and impermissibly vague" order that violates the rule of law.

4.2 On these bases, an appeal court will find that the applicant failed to meet the requirements for admission as a legal practitioner.

TAKE FURTHER NOTICE that the Intervening Party reserves the right to withdraw, amend or supplement the above grounds of appeal once the Honourable Judges' reasons for their decision are made available.

SIGNED AND DATED AT CENTURION ON THIS THE 5TH DAY OF SEPTEMBER 2025



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