

**Our Ref: MAT/N328/KS**

**Your Ref:**

**Date: 17 August 2022**

**Attention: to whom it may concern**

Per e-mail: phakamile@numsa.org.za

Dear Madam,

**RE: RUTH NTLOKOTSE – OUR CLIENT**

**IN RE: CEASE AND DESIST / DEFAMATORY PUBLICATIONS**

1. We refer to the above and hereby advise you that we act for and on behalf of our aforementioned client.
2. We have been instructed to address you herein at our client's instance and request.
3. During or around 17 August 2022 you published to a whatsapp group containing various NUMSA members, as well as to various social media platforms, a post titled "Ruth's Lies" which post contained various scathing, unlawful, wrongful and defamatory material relating to our client.

4. Your allegations made contains numerous false unlawful remarks which have the sole intention of causing damage to our clients' reputation and dignity. By extension, they have also been made in effort to disparage the good name and reputation of our client in both her personal and professional capacity, and to sully our client's reputation within NUMSA, SAFTU, South Africa and internationally.
5. Your defamatory allegations have not only prejudiced our client but are also an act of bad faith as the allegations make direct reference to an ongoing legal battle which both parties have undertook not to give any comment on to the media.
6. Given the spurious and defamatory nature of your allegations, our client will be forced to take all necessary steps to clear her good name and reputation including but not limited to a defamation application against you as well as issuing a statement to the media, should the need arise.
7. Not only have you displayed a vested interest in and intention to defame our client, but your engagements with third parties on social media, have exacerbated the situation by allowing such third parties, to further ridicule, defame and humiliate our client publicly further increasing the defamatory effect of your post.
8. Further, you have made no effort to mitigate the situation nor to alleviate any adverse consequences of your conduct.
9. In the light of the above we hereby demand that you immediately retract and delete all social media posts and / or pages on all social media platforms containing any false and defamatory information or misrepresentations such as those elucidated in this letter.

10. Additionally we demand that you refrain from making any further social media posts and / or pages containing any false and defamatory information or misrepresentations regarding our client in any manner whatsoever.
  
11. Lastly we demand that you immediately furnish our client, through our offices with the following in writing by no later than 18:00 today 17 August 2022:
  - 11.1. Confirmation that all defamatory posts of any nature whatsoever have been removed from all social media platforms;
  - 11.2. An undertaking that you will desist from any future false, defamatory and disparaging remarks about our client.
  - 11.3. A written detraction and apology addressed to our client and shared on all platforms wherein the defamatory material was shared.
  
12. Should you fail to do so we are instructed to take further legal action against you for damages on the grounds of defamation, including a cost order against you.
  
13. We trust that you will be guided accordingly.

Yours faithfully

***Electronically sent thus unsigned***

Mr K. Smith