

BC 1213 KTC Trial Papers

- A Notes, reports, memos
- A 1 History and origin of KTC Camp 1 f
 - A 2 Report on the KTC Camp and notes on Witdoeke 1 f
 - A 3 Houses (a report by Mr Ntamo and some notes including quotations of building materials) 1 f
 - A 4 Walton notes (notes taken in court, 26.05.1986) 1 f
 - A 5 Khayelitsha issue (statements by various people) 1 f
 - A 6 Yach, Derek: *The impact of political violence on health and health services in Cape Town*, 1986 1 f
 - A 7 Memos to attorneys and precedent section 32 letter, summonses and questionnaires 1 f
 - A 8 *Crisis in Crossroads: a report on Human Rights in South Africa* by Lawyers Committee for Human Rights, 1987 1 it
 - A 9 Crossroads File Notes (contains minutes of planning meeting, 01.07.1986 and a letter from Paul Pretorius to Lee Bozalek, 07.07.1986) 1 f
 - A 10 Notes on meetings held in Old Crossroads and KTC, 1979-1987. Includes various documents re Crossroads history, 1975-1983 1 f
 - A 11 Notes on Crossroads and KTC 1 f
 - A 12 Financial report (includes taxi fares, food, travel and accommodation, telephone calls, photocopy and photographs, secretarial, advocates briefs, etc, see also E 1) 1 f
 - A 13 Documents re KTC Case from Matthew Walton to Advocate H Viljoen, 1988. Includes a letter from Mrs J Worman to Minister Vlok, 1987. 1 f
 - A 14 A list of attorneys dealing with Magistrate Court Claims 1 f
 - A 15 Magistrate Court Jurisdiction (Wynberg) contact details and some extracts from Government Gazette, 1976 1 f
 - A 16 Cape Rules and Court Notices in force in the Cape of Good Hope Provincial Division 1 f
 - A 17 Bulawayo Legal Project Centre: notes re the establishment of Legal Advice Centres in Matabeleland, annual report –1986, a letter to Matthew Walton, report by the Director, etc 1 f
 - A 18 London Trip of Matthew Walton- memo and correspondence between Matthew Walton and Raymond Siff, 1988 1 f
 - A 19 Miscellaneous- notes, statements, memo and correspondence between Legal Resources Centre and other people, 1987-1988 1 f
 - A 20 *CrossTimes: South African Newsmagazine-Crossing Barriers in Southern Africa*, 1985 1 it
 - A 21 Scale Map- model of KTC and Crossroads and a statement on building of model by Gael Marie Scott 1 f
- B KTC Methodist Church
- B 1 Constitution of the Methodist Church in Africa and other documents 1 f

- B 2 Notes. Includes Divisional Council and other original documents, powers of attorney and instructions to counsel. 3 f
- B 3 Correspondence between KTC Methodist Church and attorneys, 1989-1991
Includes draft summons and original agreement entered by and between: the Administrator of the Province of the Cape of Good Hope and the Ikapa Town Council, 1989 6 f
- C Correspondence
- C 1 Correspondence between Legal Resources Centre and plaintiffs (P N Mzamka and 20 others, including Methodist Church in Africa, 1987-1989) 3 f
- C 2 Correspondence between attorneys, 1986-1990 5 f
- C 3 Letters from Legal Resources Centre to the Commissioner of Police, 1986 (17) 3 f
- C 4 Letter from Legal Resources Centre to the State Attorney re Mbewana and 5 others versus Minister of Law and Order, 08.07.1986 1 f
- C 5 Correspondence between Matthew Walton and South African Council of Churches, 1987-1988, includes an appeal against an ejection [sic] order made in the Magistrate's Court for Port Elizabeth, 1990, and the Kairos document: *Challenge to the Churches: A Theological Comment on the political crisis in South Africa* 1 f
- D Newspaper clippings
- D 1 Press statements, 1986 (on Crossroads, KTC and Nyanga) 1 f
- D 2 Cape Times clippings, 1987-1988 1 f
- D 3 Press clippings on riot control, 1985-1987 1 f
- D 4 Press clippings, 1985-1986 1 f
- D 5 KTC/Crossroads, 1985-1991 2 f
- D 6 Kangaroo Court (non KTC), 1989-1991 1 f
- D 7 Die Burger clippings, 1987-1988 1 f
- E Plaintiffs
Includes particulars of plaintiffs' claim, a letter from Legal Resources Centre, affidavits, memorandum on quantum, final offer
- E 1 P N Mzamka, S A Siwa, R E Bolani, T Magopheni, M Sobusika, Z S Cimini, (includes lists of plaintiffs and a report on expenditure, see also A 12) 8 f
- E 2 M L Njikelana, A S Napakade, P P Mpetsheni, S J Lengisi, G W Ndima, M Oliphant, S T Nkohla 7f
- E 3 J S Dudula, L G Mcanda, G N Hamnca, N F Ngxakaza, N W Kebeni, E W Mali, M B Nxuseka 7 f
- F Summaries of evidence
- F 1 Plaintiffs' Witnesses Summary, Vol. 1 4 f
- F 2 Police Witnesses Summary, Vol. 2 4 f

F 3	Police Witnesses Summary, Vol. 3	3 f
F 4	Police Witnesses Summary, Vol. 6, Court Record Number 12092-14663 (includes an index)	3 f
F 5	Police Witnesses Summary, Vol. 7	1 f
F 6	Police evidence- chronology of events	1 f
F 7	Police Witnesses, 1989	1 f
F 8	Police evidence as per incidents	1 f
F 9	Addendum to police excuses for non-action	1 f
F 10	Evidence presented in court by various people. Includes an article from Sunday Star and a plan of Nyanga Township	1 f
F 11	Spare summaries, chronologies, etc	1 f
F 12	Further witnesses summary	1 f
F 13	Wasserman evidence	1 f
F 14	Running tasks lists. Includes further statement from Jimmi Matthews and press clipping, 07.01.1988	1 f

G Actual Record of Trial

G 1	Mbewana Interdict, file number 117/86. Includes correspondence, file notes and counsels briefs)	4 f
G 2	Court cases between P N Mzamka and 20 others versus The Minister of Law and Order, notes, settlement proposal on behalf of plaintiffs	1 f
G 3	Statements for Trial, 1986	2 f
G 4	Statements for trial, 1987, section 1	4 f
G 5	Statements for trial, 1987, section 2	1 f
G 6	KTC Case – chronology	2 f

H Affidavits

H 1	Commission application	1 f
H 2	South African Defence Force affidavit, 27pp	2 f
H 3	South African Police affidavit	1 f
H 4	Respondents' affidavits (Milton Mbewana and five others)	1 f
H 5	Forms filled by plaintiffs claiming their damaged goods	1 f
H 6	Respondents discovery Vol. 2, 1986, Gugulethu Incident Book, Item 22 discovery affidavit, 01.08.1986	1 f
H 7	Defendant Discovery Affidavits, 1986-1987	1 f
H 8	Defendant Discovery Affidavits, 1987	1 f
H 9	Defendant Discovery Affidavits, 1987-1988	1 f
H 10	Applicants Founding Papers (Milton Mbewana and 5 others, Case Number 5317/86 <u>see also H 25 and H 26</u>)	1 f
H 11	Plaintiffs' Discovery Affidavits (1 Patrick Nceba Mzamka <u>see also H 15</u> , 2 Singisiwe Alcott Siwa, 3 Rhodisile Elliot Bolani, 4 Thembinkosi Magopheni, 5 Mcofane Sobusika)	5 f
H 12	Plaintiffs' Discovery Affidavits (6 Zakuthini Samuel Cimani, 7 Maxwell Lungisa Njikelana, 8 Albert Shiyekile Naphakade, 9 Phindile Patrick Mpetsheni)	4 f
H 13	Plaintiffs' Discovery Affidavits (10 Sixeko Joseph Lengisi, 11 Geza Wilson Ndima, 12 Mbuyiselo Oliphant, 13 Sicelo Theo Nkohla,	

	14 Jackson Stoti Dudula)	5 f
H 14	Plaintiffs' Discovery Affidavits (15 Lendiso Gladstone Mcanda, 16 Georgina Nomathemba Hamnca, 17 Nombulelo Floretta Ngxakaza, 18 Welakazi Nancy Kebeni, 19 Emelina Welekazi Mali, 20 Mthuthuzeli Boy Nxuseka)	6 f
H 15	Pleadings: P N Mzamka and 20 others, including consolidation application	3 f
H 16	Affidavits and statements made by plaintiffs, section 1	2 f
H 17	Affidavits and statements of witnesses who are available for trial but who have not yet been re interviewed (includes index, section 2)	1 f
H 18	Statements by residents of KTC, journalists, medical doctors and Nyanga residents	2 f
H 19	Affidavits by clerics, residents and medical practitioner	1 f
H 20	Legal Papers on Milton Mbewana and 5 others, head of argument, applicants' supplementary affidavit	1 f
H 21	Affidavits (Milton Mbewana page 17 to Nolitha Sileti page 99)	1 f
H 22	Affidavits (Dina De Kock, page 102 to Simon Mngakane p 139)	1 f
H 23	Affidavits (Enoch M Ngwenze page 144 to Clifford Noel Bestall, 234)	1 f
H 24	Affidavits by ministers, priests, medical doctors, journalists and residents of KTC and Nyanga	2 f
H 25	Applicants Founding Papers (Milton Mbewana and 5 others versus Minister of Law and Order, case number 5317/86 <u>see also H 10</u>)	
H 26	Mbewana and others versus Minister of Law and Order, Vol. 2	
H 27	Schedule of property/goods lost or destroyed	2 f
H 28	Returns of service file	1 f

J Witnesses statements

J 1	Crossroads/KTC (plaintiffs and witnesses, number 21-43)	3 f
J 2	Major C A J Odendaal/South African Defence Force (Kruisverhoor/Cross-examination of C A J Odendaal, the period from time both factions gather until the Witdoeke advance towards KTC) <u>see also J 5</u>	7 f
J 3	University of Cape Town Criminology statements (covers police accompanying Witdoeke, Nyanga/Langa/Gugulethu/New Crossroads, All Saints/Plumstead, KTC residents, Christ Church/Kenilworth, Holy Cross/Warmer/Woodstock, Nyanga Bush/Portland Cement)	8 f
J 4	Expert witnesses (David Klatzow, Leonard Adams and experts) re quantum of KTC dwellings	4 f
J 5	South African Police (memorandum on troop re-enforcements, South African Railway Police Actions, South African Police Investigating Satellite Camps, South African Police investigating KTC, minutes of meetings in Manenberg, South African Vehicle reports & C A J Odendaal) <u>see J 2</u>	6 f
J 6	Lawyers (Leonard John Bozalek, William Ralph Kerfoot, Matthew Lamont Walton. Includes some notes on cross examination)	6 f
J 7	Heads of argument	4 f
J 8	Further KTC statement topics incidents 8 th edition; scenes and themes from video material; memorandum re Bernard Book; police excuses;	

	crowd control; extract from a pocket book of Sgt T F Smith discovered in the matter C M Knight/Minister of Law and Order and KTC Case:	
	address to national conference	1 f
J 9	Urban Foundation Report	1 f
J 10	Statements of Colin Stuart (surveyor)	1 f
J 11	Nyanga Extension Witnesses- further statements	1 f
J 12	Chronology of events, memoranda, etc, includes sequence of events re Mrs Benga	6 f
J 13	Witnesses and interpreters	1 f
J 14	Subpoenas	1 f
J 15	Quantum (Mzamka) <u>see also H 11</u>	1 f
J 16	Affidavits and statements made by other residents, section 2	4 f
J 17	Affidavits and statements made by journalists and cameramen	9 f
J 18	Further KTC and Crossroads statements. Includes correspondence between KTC Deeds Office Search Legal Resources Centre, 1986	4 f
J 19	Counsel's briefs, counsel's memos, instructions to counsel and combined summons in the matter between P N Mzamka, A M Fandashe, Lawrence Kombisa Lumphondo, the Methodist Church in Africa and the Minister of Law and Order	4 f
J 20	Affidavits and statement made by priests, clerics and church (Methodist Church in Africa includes a plan)	5 f
J 21	Affidavits and statements made by doctors/nurses, 1986	1 f
J 22	Affidavits and statements by doctors, Vol. 2	1 f
J 23	Topics/incidents (3 rd & 4 th edition)	1 f
J 24	Topics/incidents (6 th edition)	1 f
J 25	Spare copies of Lee's file notes and memos on Crossroads case	1 f
J 26	Affidavit and statement by Youth/Comrades, 1986	1 f
J 27	Affidavits and statements, Vol. 2 (miscellaneous)	1 f
J 28	Affidavits and statements, Vol. 2 (miscellaneous - clerics, residents, teacher, Member of Parliament, surveyor, journalist, Red Cross witnesses)	1 f
J 29	Affidavits and statements, Vol. 2 made by doctors, journalists and lawyers	1 f
J 30	Affidavits and statements made by KTC residents	6 f
J 31	70 witnesses (Mzamka and others versus The Minister of Law and Order. Includes correspondence between Advocate G D Griessel and H P Viljoen, 15.03.1989-20.04.1989)	4 f
J 32	Documents supplied to PSP as part of his brief	3 f
J 33	Police Action Against Witdoeke Only, 1986	1 f
J 34	Spare copies of KTC statements (chronology of events, photographer and police commentary)	1 f

K Exhibits

K 1	Memorandum from Steve and Matthew to the Legal Team, 1988-1989 (re KTC, inquest information exhibit 73: omissions list, application to set aside Ngxobongwana's appointment as mayor and appointment of Old Crossroads' Town Committee, helicopter, reference to SADF, tracer bullets, magna powder)	1 f
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K 2	Notes, reports, memo, extracts, Odendaal Personal File, scenes and themes from video material	1 f
K 3	Cross- examination notes and memo	1 f
K 4	Video material	1 f
K 5	Chronology of events- police (on floppy disk)	1 f
K 6	Video file	2 f
K 7	Video unit file	1 f
K 8	Transcription – videotapes, police commentary on videos discovered by defendant	1 f
K 9	List of police on duty	1 f
K 10	Magna powder memo	1 f
K 11	Movables (quantum)	1 f
K 12	Crossroads/KTC telephone calls made	1 f
K 13	KTC video cassettes, audio cassettes and slides	29 it
K 14	Floppy and hard disks <u>see K5</u>	100 it
K 15	Photographs (witdoeke/vigilantes, South African Police, Squatter Camps, P W Botha, Adriaan Vlok, etc)	25 f

KTC Relief Fund

L Notes, reports, statements

L 1	Notes on meeting with Oliver Memani, 1991. Includes 4 letters to Mr Bieber, 1991	1 f
L 2	Statement on office equipment	1 f
L 3	Hugh Jagoë's final report, includes reports by other Trustees	1 f

M Lists of Trustees, press statement and various papers 1 f

N Minutes of Trustee meetings

N 1	Minutes of meeting of the Trustees of the KTC Relief Fund, 12.06.1990-09.07.1990	1 f
N 2	Minutes of meeting of the Trustees of the KTC Relief Fund, 21.08.1990	1 f
N 3	Minutes of meeting of the Trustees of the KTC Relief Fund, 1990-1991	1 f
N 4	Minutes of meeting of the Trustees of the KTC Relief Fund, 1991-1992, includes minutes of the first Annual General Meeting, 15.10.1991	1 f

P General correspondence

P 1	Correspondence between A Turner and Lynne Aschman, 1990-1991. Includes financial statements, 1991-1992	1 f
P 2	Letters from Lynne Aschman to other Trustees, 1990-1991	1 f
P 3	Correspondence (Liason Committee), 1990-1991	1 f
P 4	Department of Education and Training correspondence, 1991-1992. Includes minutes of the meeting with the Department of Education and Training, 01.08.1991	1 f

P 5	Correspondence between Vi Bell and Advocate Arthur Chaskalson, 1990-1992	1 f
P 6	Correspondence between Vi Bell and Charl Cilliers, 1991-1992	1 f
P 7	Correspondence re Tax exemptions, 1990-1992	1 f
P 8	Correspondence to Intermediaries re claim settlements, 1991-1992	1 f
P 9	Correspondence re office facilities between various people, 1991-1992	1 f
P 10	General Office correspondence between various people, 1990-1992	1 f
P 11	Correspondence re leases/contracts between Tempest Car Hire and V L Bell, 1992	1 f
P 12	Correspondence re leases/contracts between The Paper Bank and Hugh Jagoe, 1992	1 f
P 13	Correspondence re leases/contracts between Old Mutual and V L Bell, 1991-1992, includes notes on general conditions of lease	1 f
P 14	Correspondence re Insurance between Pritima of Legal Resources Centre and Lynne Aschman, 1990-1991	1 f
P 15	Correspondence re insurance between Commercial Union Insurance and KTC Relief Fund, 1990-1992, includes notes on Multi Peril Policy	1 f
P 16	Correspondence between The Chairman of the Board of Trustees and The State Attorney, 1990-1992 <i>Includes:</i> Lists of outstanding withdrawals includes list of attorneys and their codes	3 f
P 17	Correspondence re physical injury-claim letters, 1991 <i>Includes:</i>	1 f
P 17.1	Correspondence re Ex Gratia, 1992	1 f
P 17.2	Notice of withdrawal of action in the matter between Siphon Ndzongu and The Minister of Law and Order, 1992	1 f
P 17.3	Memo and summons	1 f
P 17.4	Physical Injury Pay-out	1 f
Q	Projects	
Q 1	Applications for assistance, 1991-1992	1 f
Q 2	Information on training course in child safety	1 f
Q 3	Correspondence re crèche buildings, equipment and teachers between Vi Bell and various institutions, 24.03.1992	1 f
Q 4	Correspondence re teachers salaries, 1991-1992, including Perm Receipt Documents	1 f
Q 5	Correspondence re mobile clinic between SHAWCO and the KTC Relief Fund, 1992, including minutes of the meeting attended by SHAWCO and the KTC Relief Fund, 24.02.1992	1 f
Q 6	Photographs (sewing projects and crèches)	1 f

R Fundraising

R 1	Correspondence between the Director of Fundraising (KTC Relief Fund) and Department of National Health and Population Development, 1990-1992	1 f
R 2	Correspondence between Richard Rosenthal and Liberty Life, 1990-1992	1 f
R 3	Correspondence between United States Aid and Richard Rosenthal, 1991-1992	1 f
R 4	Correspondence between Richard Rosenthal and Brigadier Rudolf Hiemstra, 1990-1992	1 f
R 5	Correspondence between South African Perm Bank and Hugh Jagoe, 1991	1 f
R 6	Correspondence re name changing between Richard Rosenthal and Standard Bank, 1991	1 f
R 7	Correspondence between Standard Bank and Hugh Jagoe, 1990-1992, includes schedule to electronic banking services agreement, transmission cover sheet, etc	1 f
R 8	A letter to Office of Development Affairs, American Embassy from Richard Rosenthal, 29.06.1990	1 f
R 9	Two letters to German Ambassador from Richard Rosenthal, 1990-1991	1 f
R 10	Correspondence between Richard Rosenthal and the Urban Foundation, 1990-1991	1 f
R 11	Correspondence between Richard Rosenthal and the D G Murray Trust, 1990-1992	1 f
R 12	Correspondence between Richard Rosenthal and the Independent Development Trust, 1991-1992	1 f
R 13	Investment, 28.06.1990 (statement)	1 f

S Correspondence between attorneys

S 1	Correspondence sent to all attorneys, 1990-1992. Includes lists of attorneys	1 f
S 2	Findlay & Tait Inc, C B Fortuin & Associates, C & A Friedlander, Zelda Gordon, Herold Gie Inc, C M McDonald Papier & Associates	1 f
S 3	Mallinick Ress Richman & Closenber, H Mohamed & Associates, E Moosa & Associates, Nacerodien & Cariem	1 f
S 4	Bernadt Vukic & Potash, Coulters Van Gend & Kotze, Dadarker & Associates, Dichmont & Dichmont, Y Ebrahim & Company	1 f
S 5	Rouledge McCallums, Shields Sloth & Nielson, Sonnenberg Hoffman & Galombik, Simon Abel & Son	1 f
S 6	Yekiso & Associates, Legal Resources Centre, Truter & Hurter Inc	1 f
S 7	R H Stuurman & Company, Abe Swersky & Associates, Syfret Godlonton Fuller Moore Inc, Van Der Ross & Motala, Wilkinson Joshua Gihwala & Abercrombie	1 f

T	KTC Claims Payout		
T 1	Report on the KTC Trial	1 f	
T 2	Decisions and steps to be taken by the Trustees	1 f	
T 3	Notification to lodge claims	1 f	
T 4	Progress report and community lists (residents of KTC and Nyanga Extension, 1986)	1 f	
T 5	Ten letters sent to plaintiffs/claimants, 1990-1991	1 f	
T 6	Claimant payouts	1 f	
T 7	Questionnaires to be completed by plaintiffs/claimants		1f
T 8	Plaintiffs legal documents	1 f	
T 9	Publicity/press	1 f	
T 10	Pay-out figures/statistics	1 f	
T 11	Lists of plaintiffs	2 f	
T 12	Lists of late plaintiffs	1 f	
T 13	Lists of the people who were rejected	1 f	
T 14	Lists of non plaintiffs	1 f	

U Dissolution of the Trust

U 1	Notarial deed of Trust	1 f	
U 2	Deed of amendments	1 f	
U 3	Deed of dissolution of Trust	1 f	
U 4	Summary of Trust Deeds	1 f	
U 5	Printouts of monthly management accounts, 1990-1991	5 f	
U 6	Masters letters of authority	1 f	
U 7	Richard Rosenthal correspondence, 30.01.1990-30.09.1990		1 f
	<i>Includes:</i>		
	List of attorneys handed to KTC matters		
	Notarial deed of variation of Trust and Resolution of the Legal Resources Trust		
U 8	Permanent staff (employees' particulars, salary records and correspondence between permanent staff and KTC Relief Fund)		1 f
U 9	Temporary staff (employees' particulars and salary records)		1 f
U 10	Casual staff (employees' particulars, salary records and correspondence between casual staff and KTC Relief Fund)		1 f
U 11	Casual Staff Payments, 1991-1992	1 f	
U 12	Workmen's compensation	1 f	
U 13	U.I.F. record	1 f	
U 14	PAYE Tax Remittances, 1992 (correspondence between PAYE Dept and KTC Relief Fund, 1992 includes Cash Register Receipts)		1 f
U 15	Acknowledgement of receipt of payment, 1992	1 f	
U 16	Forms		
	U 16.1 IRP 4 (Remittance returns and Cash Register Receipts, 1992)	1 f	
	U 16.2 IRP 5, IRP 5 A, IT 3 A, IRP 1 A, IRP 2	1 f	