

**IN THE HIGH COURT OF SOUTH AFRICA**  
**WESTERN CAPE DIVISION, CAPE TOWN**

CASE NUMBER: 9742/2021

In the application between: -

**MRS SA BEAUTY PAGEANT (PTY) LTD**

First applicant

**JOANI JOHNSON**

Second applicant

and

**USPIKED (PTY) LTD**

First respondent

(REGISTRATION NUMBER: 2014/060284/07)

**THOMAS, MARK QUASHA**

Second respondent

**GOOSEN-JOUBERT, CHANDRE**

Third respondent

---

**FOUNDING AFFIDAVIT**

---

I, the undersigned,

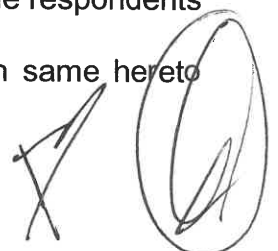
**CASPER HENDRIK DU PLESSIS**

do hereby make oath and state as follows: -

1. I am a major male, duly admitted attorney of the High Court of South Africa, practising as such as a director at Honey Incorporated Attorneys ("*Honey*") of Northridge Mall, Kenneth Kaunda Road, Bloemfontein.

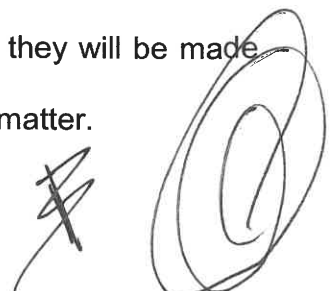


2. The contents of this affidavit fall within my personal knowledge, save where otherwise stated or apparent from the context, and are to the best of my belief both true and correct.
3. Honey are the attorneys of record of the applicants, and I am the attorney at Honey dealing with this matter on behalf of the applicants.
4. I depose to this affidavit for purposes of seeking relief from the Honourable Court on an urgent basis against the facts set out below.
5. The purpose of this application is to seek the urgent relief contained in the notice of motion. Previously similar relief was sought under case number 9742/2021 ("Case 9742/2021"). When the application papers were issued in Case 742/2021, the applicants formed the view on the advice given to them, that there was no need for that application to be launched on an urgent basis as it was considered that the third applicant would desist from continuing with her defamation of the applicants.
6. However, as will appear from that which follows below, circumstances have necessitated the launching of this urgent application for purposes of seeking the relief in the notice of motion, albeit the same as in Case 9742/2021 on an urgent basis.
7. Save for that which is stated below, the applicants' case against the respondents is contained in the founding papers in Case 9742/2021. I attach same hereto

Handwritten signature and a large circular stamp, likely a court seal or official mark, located at the bottom right of the page.

annexure **"FA1"**. The applicants rely on what is stated in annexure **"FA1"** and herein for the relief sought in the notice of motion. Accordingly, I request the Court to consider the contents of annexure **"FA1"** as incorporated herein.

8. The deponent to the founding affidavit in Case 9742/2021, Ms Joani Johnson, cannot presently depose to an affidavit as she has tested positive for Covid-19 as appears from annexure **"FA2"** hereto and is consequently in isolation. However, should it be possible for her to attend a commissioner of oaths prior to the hearing of this matter, a confirmatory and supporting affidavit from her will be made available to the Honourable Court. In the meantime, however, I submit that I am in a position to depose to this affidavit as the facts herein contained fall within my personal knowledge, as aforesaid. In addition, that which I state below accords with my instructions, in particular seeking that the matter be dealt with on an urgent basis.
9. The application under Case 9742/2021 was issued out of the above Honourable Court on 9 June 2021. Same was served by way of e-mail on the first and second respondents on 9 June 2021 as appears from annexure **"FA3"** hereto. Thereafter the application under Case 9742/2021 was served on the third respondent by the Sheriff on 14 June 2021 by the Sheriff. Although my correspondent attorneys have received telephonic confirmation from the sheriff that same has been served, I am still awaiting the sheriff's returns of service. Should they come to hand prior to the hearing of the matter, they will be made available to the above Honourable Court at the hearing of the matter.

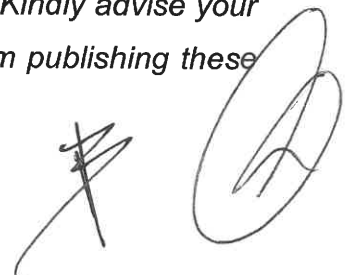
The block contains two handwritten marks at the bottom right of the page. On the left is a signature, appearing to be 'Z' with a long horizontal stroke. To its right is a large, circular, hand-drawn stamp or seal, possibly containing a date or initials, though it is too faint to read clearly.

10. All of the respondents have filed notices of intention to oppose Case 9742/2021. In this regard (and albeit the notices of intention to oppose form part of the bundle of documents in Case 9742/2021) I attach same hereto for the Court's convenience as follows: -

10.1. On 18 June 2021 E Rowan Incorporated Attorneys served a notice of intention to oppose purportedly on behalf of all three respondents, as appears from annexure "FA4" hereto. However, the day before that, the first and second respondents, in person, filed a notice of intention to oppose at the Court, but only sent it to all parties by email on 18 June 2021 as appears from annexure "FA5" hereto;

10.2. Because of the aforesaid, I addressed a letter to E Rowan Incorporated Attorneys dated 21 June 2021, a copy of which is attached hereto as annexure "FA6", wherein I requested E Rowan Incorporated Attorneys to advise exactly on whose behalf they were acting. In addition, and due to that which is stated below, I also posed the following in the fourth paragraph of the said letter: -

*"Your client, the third respondent, despite the Application being served on her, persists with her defamatory comments on social media. Should your client not refrain from placing these defamatory comments on social media we will have no alternative but to enrol the Application on an urgent basis. Kindly advise your client accordingly and request her to refrain from publishing these*

Two handwritten signatures in black ink are located at the bottom right of the page. The signature on the left is a stylized, cursive mark, while the one on the right is a more circular, looped signature.

*defamatory comments and/or any statements regarding our clients on social media with immediate effect.”*

10.3. I also humbly refer the Honourable Court to annexures “FA7.1” to “FA7.12”, being screenshots of the Instagram account of the third respondent wherefrom it is apparent that the third respondent is continuing with her incendiary and defamatory statements of and about the first and second applicants on social media. I refrain from repeating the entire contents thereof. Suffice it to state the following: -

10.3.1. In annexure “FA7.1” she posted on 21 June 2021 that: -

*“Mrs SA is a disgrace”*

10.3.2. In annexure “FA7.2” she posted on 21 June 2021 that: -

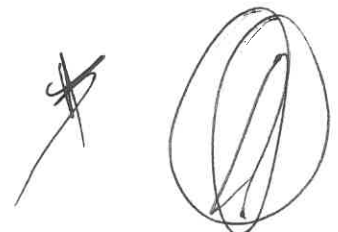
*“I find it ironic that testimonials are done by women that is now again being used by the organization’s wrongdoing...*

*Covering it up wont work this time...”*

10.3.3. In annexure “FA7.3” she posted on 21 June 2021 that: -

*“I wont stop exposing women abuse Mrs South Africa!!!!  
You are abusing women for your own pockets.”*

10.3.4. In annexure “FA7.4” (posted 20 June 2021) she appears to have

The block contains two handwritten marks. On the left is a signature consisting of a stylized 'S' followed by a diagonal stroke. To its right is a large, loopy circular scribble.

found support from an unknown source. I humbly submit that given that a trial is envisaged, should the Honourable Court grant interim relief as opposed to final relief, all of these incendiary remarks can be dealt with at the trial;

10.3.5. In annexures "FA7.5" (posted 20 June 2021) communication in the same vein occurred on 11 June 2021;

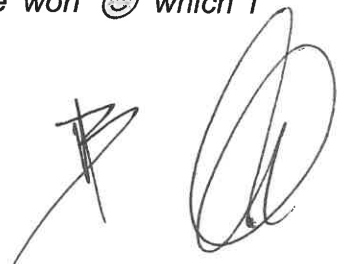
10.3.6. In annexure "FA7.6" (posted 20 June 2021) the third respondent stated: -

*"I will make it priority to close it down",*

thereby leaving no doubt as to her ultimate aim, i.e. to destroy the business of the first applicant;

10.3.7. In annexure "FA7.7" (posted 20 June 2021) a person, apparently supporting the egregious cause of the third respondent, made a defamatory statement as follows: -

*"Hi Chandre, no, I read your article on your experience with the Mrs SA pagent (sic) and support you so I wanted to reach out. I feel that this should come out. I have experience with a lady that once entered and because her hubby has an endless pit of money she won 😊 which I think is absolute bullshit. So keep going."*

Two handwritten signatures in black ink. The signature on the left is a stylized, cursive 'P' with a long horizontal stroke extending to the right. The signature on the right is a more complex, cursive signature with a large loop at the top and a long horizontal stroke extending to the right.

10.3.8. On annexure “FA7.8” (posted 16 June 2021) an unknown person joined the conversation as follows: -

*“Ek sien jy follow reeds... Wat Joani ook afgepers het met prokureers (sic) om stil te bly. Toe sê ... sy sal nie staan vir Joani agter skerm by judging en waarvoor die organisasie staan nie toe gee sy haar kroon terug en sy kry tot vandag toe gee erkenning dat sy ooit gewen het nie.*

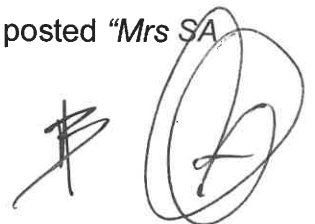
*My storie het ek geen feite nie behalwe wat ... vir my gesê het en die feit dat Joani geweier het om vir my die finale SMS results of judging forms wou gee nie ongeag hoe sy altyd preek hoe transparent hulle is.”*

It is thus apparent that even the conjecture of third parties is now making it onto social media;

10.3.9. In annexure “FA7.9” (posted 21 June 2021) the letter which I addressed to E Rowan Incorporated Attorneys (annexure “FA6”) was posted on the Instagram account of the third respondent with the inscription “No Mrs SA - I will not be silenced”;

10.3.10. In annexure “FA7.10” (posted 20 June 2021) the notice of intention to oppose by E Rowan Incorporated was posted on the third respondent’s Instagram account with the subscript “What a wonderful opportunity to present the truth”;

10.3.11. In annexure “FA7.11” (posted 21 June 2021) she posted “Mrs SA

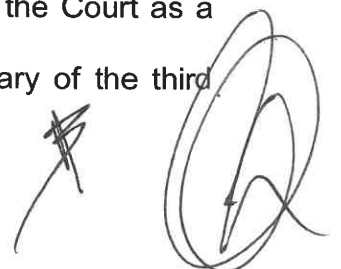
Handwritten signature and a large circular mark, possibly a stamp or a large 'B'.

*is a disgrace*", as well as a link which leads one, when clicked on, to an article by Ms Olwethu Leshabane, apparently a contestant during the 2017 competition and in which Ms Leshabane expresses her disappointment for not having won the competition. In this way the third respondent makes the complaints of other non-winners in the competition part of the dispute between her and the applicants. This is, with respect, no less than an attempt to bolster her egregious and defamatory statements;

10.3.12. In annexure "FA7.12" (posted 21 June 2021) she, quite clearly referring to the statement in the founding affidavit, stated that: -

*"But lemme guess she will also be labelled as a disgruntled finalist right @Chandre LadyG."*

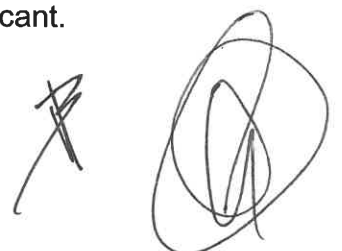
11. It is with respect apparent from the above that the third respondent has no intention of ceasing with her defamatory remarks of and about the first and second applicants, despite knowing that a court application to obtain interdictory relief is pending.
12. I submit that the behaviour of the third respondent is indicative of *mala fides* on the side of the third respondent and that the statement on annexure "FA7.9" that *"No Mrs SA – I will not be silenced"* constitutes scandalising of the Court as a species of contempt. Furthermore, I submit that the commentary of the third

Handwritten signature and initials in black ink, located at the bottom right of the page.



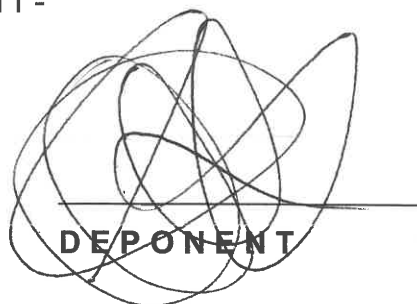
respondent goes well beyond what is allowed as freedom of speech. At the hearing of the matter argument in this regard will be presented to the Honourable Court.

13. I submit that the insistence of the third respondent to continue with her defamatory remarks and her apparent contempt for the Court in that she, in her own words, "*will not be silenced*" constitutes grounds for this matter to be dealt with as an urgent application. I submit that it is apparent from the conduct of the third respondent that she will not stop making defamatory statements of and about the applicants until such time as there is a court order.
14. Accordingly, whereas the applicants initially considered that it was sufficient for the matter to be placed on the normal motion court roll the situation at present requires urgent Court intervention.
15. I am advised by my Cape Town correspondent that in cases where the papers have been completed, a hearing date is likely to be allocated for late October or early November 2021. However, in Case 9742/2021 papers still have to be finalised which will likely add 5 weeks to the process. On that basis, a hearing date of somewhere in December 2021 or even 2022 is likely.
16. In the meantime, the continuous defaming of the first and second applicants will likely continue and will, no doubt, lead to substantial prejudice, damages and injustice to them and may even lead to the failure of the first applicant.

The block contains two handwritten marks. On the left is a signature that appears to be 'P' with a long horizontal stroke extending to the left. On the right is a large, circular, scribbled mark, possibly representing initials or a stamp.

17. I submit that given the above and that which is set out in the founding affidavit in Case 9742/2021 (annexure "FA1"), the applicants will not obtain substantial redress in due course if the interdictory relief, alternatively at least the interim interdictory relief sought in the notice of motion is not granted at urgently. A damages claim in due course will also prove cold comfort if the first applicant is to fail as a result of the continuous defamation of the third respondent. Furthermore, the Court should not allow the third respondent's incendiary and defamatory statements of the applicants to continue and, so I submit, assist the applicants to protect their good names and reputations.
18. In regard to the first and second respondents, and although the applicants are not aware that any one of them have made further defamatory publications and/or comments since service of the papers in Case 9742/2021, it is by the very nature of the interwoven facts necessary that the whole application be dealt with as an urgent application. I submit that there is no other practical way for the applicants to obtain the relief and that the first and second respondents stand to suffer no prejudice should the Court hear application also as against them.
19. I therefore submit that a case for urgency has been made out so that the Court can at the very least issue an interim order as prayed for in the notice of motion initially issued.
20. Accordingly, I pray for an order as per the notice of motion to which this affidavit is attached.

Two handwritten signatures in black ink. The signature on the left is a stylized, angular mark. The signature on the right is a more complex, circular scribble.

  
DEPONENT

THUS SIGNED AND SWORN TO AT Bloemfontein ON THIS 22<sup>nd</sup> DAY OF June 2021, THE DEPONENT HAVING ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, THAT IT IS BOTH TRUE AND CORRECT TO THE BEST OF HIS KNOWLEDGE AND BELIEF, THAT HE HAS NO OBJECTION TO TAKING THE PRESCRIBED OATH AND THAT THE PRESCRIBED OATH WILL BE BINDING ON HIS CONSCIENCE.

  
\_\_\_\_\_  
**COMMISSIONER OF OATHS**

FULL NAMES:

DESIGNATION:

ADDRESS:

KOMMISSARIS VAN EDE  
**HENDRIK BOOYSEN**  
HJ BOOYSEN PROKUREURS INC.  
87 KELLNERSTRAAT • EENHEID 1  
WESTDENE • BLOEMFONTEIN  
PRAKTISERENDE PROKUREUR RSA



**Dis-Chem Victory Park - S038**  
 Shop G12 Victory Park Shopping Cent  
 Victory Park  
 GP, 2195  
 RAMS NO.: 0420778

PATIENT COPY

VIS0284787

15.06.2021

## COVID-19 Rapid Antigen Test and Referral

### To Whom It May Concern

This letter serves to confirm that Joani Johnson has voluntarily undergone a COVID-19 Rapid Antigen Test at the above stated premises and has been resulted on 15.06.2021 at 11:34:47.

The test has produced the following result:

**POSITIVE**

Interpretation of a POSITIVE result: (Reported as detected)

A POSITIVE result indicates the presence of SARS-CoV-2 (COVID-19). Patients are advised to contact their doctor immediately for clinical guidance and management. Self-isolation is necessary for at least 10 days unless hospitalization is required. It is further recommended that all close contacts also undergo testing for SARS-CoV-2 (COVID-19).

#### PATIENT INFO:

**Name:** Joani Johnson  
**Tel No.:** 0726204127  
**Email:** acemodels@gmail.com  
**ID:** 8101210191084

#### EXAMINATION INFO:

**Examined By:** Alison Pieterse  
**Examined On:** 15.06.2021  
**Examined At:** Dis-Chem Victory Park - S038  
**Registration No.:** 15308968

#### Symptom

TEMPERATURE

FEVER

SORE THROAT

COUGH

ISSUES BREATHING

HAD DIRECT / INDIRECT CONTACT WITH  
 COVID19 POSITIVE INDIVIDUAL

OXIMETER READING

#### Result

36.3 ° C

NEGATIVE

NEGATIVE

POSITIVE

NEGATIVE

YES

93%



Authenticity Check

#### Please Note

- This procedure is non-claimable by all medical aid providers.
- Given the current level of knowledge about SARS-CoV-2 tests, regardless of your test result, you must continue to apply basic non-pharmaceutical interventions (hand hygiene, social distancing and wearing of masks).
- Dis-Chem shall not be held liable to a patient for any loss or harm whatsoever.

#### Disclaimer:

The information contained in the above document is confidential. It is intended solely for use by Joani Johnson and others authorized to receive it. If you are not Joani Johnson, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

Powered By:



"FA3"

## Casper du Plessis

---

**From:** Casper du Plessis  
**Sent:** 09 June 2021 16:30  
**To:** [REDACTED]@uspiked.com  
**Subject:** SERVICE: NOTICE OF MOTION, FOUNDING AFFIDAVIT AND ANNEXURES - CASE NUMBER 9742/2021 - MRS SA BEAUTY PAGEANT (PTY)LTD +1 OTHER // USPIKE + 2 OTHERS  
**Attachments:** SKM\_75821060915270.pdf  
**Importance:** High

Dear Mr Mark Thomas,

We refer to the above matter and confirm that we act on behalf of the 1st (first) and 2nd (second) applicants in an application that was issued In The High Court of South Africa, Western Cape Division, Cape Town under case number 9742/2021

The application (consisting of the Notice of Motion, founding affidavit and annexures thereto) is attached hereto and simultaneously served on yourself (second respondent) and Uspike (first Respondent).

We confirm that the application will also be served on both yourself and Uspike by the Sheriff of the High Court.

We will send (and serve) the application in four (4) separate emails.

Kind regards

EMAIL 1 OF 4

## Casper du Plessis

---

**From:** Casper du Plessis  
**Sent:** 09 June 2021 16:31  
**To:** [REDACTED]@uspiked.com  
**Subject:** SERVICE: NOTICE OF MOTION, FOUNDING AFFIDAVIT AND ANNEXURES - CASE NUMBER 9742/2021 - MRS SA BEAUTY PAGEANT (PTY)LTD +1 OTHER // USPIKE + 2 OTHERS  
**Attachments:** SKM\_75821060915280.pdf  
**Importance:** High

EMAIL 2 OF 4

## Casper du Plessis

---

**From:** Casper du Plessis  
**Sent:** 09 June 2021 16:31  
**To:** [REDACTED]@uspiked.com  
**Subject:** SERVICE: NOTICE OF MOTION, FOUNDING AFFIDAVIT AND ANNEXURES - CASE NUMBER 9742/2021 - MRS SA BEAUTY PAGEANT (PTY)LTD +1 OTHER // USPIKE + 2 OTHERS  
**Attachments:** SKM\_75821060915310.pdf  
**Importance:** High

EMAIL 3 OF 4

## Casper du Plessis

---

**From:** Casper du Plessis  
**Sent:** 09 June 2021 16:31  
**To:** [REDACTED]@uspiked.com  
**Subject:** SERVICE: NOTICE OF MOTION, FOUNDING AFFIDAVIT AND ANNEXURES - CASE NUMBER 9742/2021 - MRS SA BEAUTY PAGEANT (PTY)LTD + 1 OTHER // USPIKE + 2 OTHERS  
**Attachments:** SKM\_75821060915320.pdf  
**Importance:** High

EMAIL 4 OF 4



"FA4"

## Casper du Plessis

---

**From:** Ella Rowan <[REDACTED]@rowaninc.co.za>  
**Sent:** 18 June 2021 14:13  
**To:** Casper du Plessis, [REDACTED]@jvaa.co.za  
**Subject:** Mrs SA Beauty Pageant (Pty) Ltd & Another // Uspiked (Pty) Ltd & 2 Others  
**Attachments:** Notice of Intention to Oppose.pdf

**Importance:** High

**Our Ref:** ELLA/JO0022

Dear Sir / Madam,

Please find attached hereto, for service, the Respondents' Notice of Intention to Oppose under Western Cape High Court Case Number: 9742/2021.

Yours faithfully,



**E. ROWAN**  
*Incorporated*

Ella Rowan  
*Director*

**E** ella@rowaninc.co.za  
**T** (021) 422 4892

**W** www.rowaninc.co.za  
**F** (021) 424 7856

Associated with Russell Knight and Associates | Table View : (021) 556 7971

The information in this e-mail is confidential and is legally privileged. It is intended solely for the addressee. Access to this e-mail by anyone else is unauthorised. If you are not the intended recipient, any disclosure, copying, distribution or any action taken or omitted in reliance on it, is prohibited and may be unlawful. Whilst all reasonable steps are taken to ensure the accuracy and integrity of information and data transmitted electronically and to preserve the confidentiality thereof, no liability or responsibility whatsoever is accepted if information or data is, for whatever reason, corrupted or does not reach its intended destination

**IN THE HIGH COURT OF SOUTH AFRICA  
(WESTERN CAPE DIVISION, CAPE TOWN)**

**Case Number: 9742/2021**

In the matter between:-

**MRS SA BEAUTY PAGEANT (PTY) LTD**

**1<sup>st</sup> Applicant**

**JOANI JOHNSON**

**2<sup>nd</sup> Applicant**

and

**USPIKED (PTY) LTD**

**1<sup>st</sup> Respondent**

**THOMAS, MARK QUASHA**

**2<sup>nd</sup> Respondent**

**GOOSEN-JOUBERT, CHANDRE**

**3<sup>rd</sup> Respondent**

<p><b>NOTICE OF INTENTION TO OPPOSE</b></p>
---

**KINDLY TAKE NOTICE** that the Respondents intend to oppose the Applicants' application, set down for hearing on 5 October 2021 and appoints the undermentioned attorneys as their attorneys of record and their address as the address for service of all documents and processes in this application.

**PLEASE TAKE FURTHER NOTICE** that the Respondents agree to accept service via email, during normal business hours, at the following email address:  
**@rowaninc.co.za.**

**DATED AT CAPE TOWN ON THIS THE 18<sup>th</sup> DAY OF JUNE 2021**



---

**E ROWAN INC.**

**ATTORNEYS FOR THE RESPONDENTS**

Unit 47, Roeland Square

Drury Lane, Gardens



CAPE TOWN

Tel: 021 422 4892

Email: @rowaninc.co.za

Ref: ELLA/JO0022

**TO: THE REGISTRAR OF THE  
ABOVE HONOURABLE COURT  
CAPE TOWN**

**AND TO: HONEY INCORPORATED**  
**ATTORNEYS FOR THE APPLICANTS**  
Tel: 051 403 6600  
Email: @honeyinc.co.za  
**C/O JOHAN VICTOR ATTORNEYS**  
3<sup>rd</sup> Floor, The Chambers  
55 Keerom Street  
CAPE TOWN  
Tel: 021 422 0369  
Email: @jvaa.co.za  
Ref: GJV/cw/BXX

**SERVICE VIA EMAIL**

E. Rowan Inc. – JO0022  
Tel: 021 422 4892  
Box No: 57

**Casper du Plessis**

---

**From:** [REDACTED]@uspiked.com  
**Sent:** 18 June 2021 16:57  
**To:** Casper du Plessis [REDACTED]@jvaa.co.za  
**Cc:** Goose [REDACTED]@uspiked.com  
**Subject:** Notice of Intention to Oppose  
**Attachments:** NoticeToOppose.pdf

Dear all,

Attached kindly find The First & Second Respondents' Notice of Intention to Oppose.

Best Regards,

Mark Thomas  
Editor-in-Chief  
uSpiked  
P.O. Box 483  
Cape Town 8000  
South Africa  
Tel: [REDACTED]  
Cell: [REDACTED]  
Twitter: @MarkCTN  
email [REDACTED]@uspiked.com  
[www.uspiked.com](http://www.uspiked.com)



CONFIDENTIAL: The information contained in this communication, including its attachments, personal information in the signature, may contain confidential information and is intended only for the individual(s) or entity(ies) to whom it is addressed. The information contained in this communication may also be protected by other privileges, including, but not limited to National, International and IP laws or other applicable law. If you are not the intended recipient of this communication, you are hereby notified that any distribution, dissemination or duplication of this communication is strictly prohibited. If you have received this communication in error please immediately delete and destroy all copies of this message and please immediately notify us of the error by separate communication. Thank you.

**IN THE HIGH COURT OF SOUTH AFRICA  
(WESTERN CAPE DIVISION, CAPE TOWN)**

**CASE NO: 9742/2021**

**MRS SA BEAUTY PAGEANT (PTY) LTD**

First Applicant

**JOANI JOHNSON**

Second Applicant

**AND**

**U-SPIKED (PTY) LTD**

First Respondent

**MARK QUASHA THOMAS**

Second Respondent

**CHANDRE GOOSEN-JOBERT**

Third Respondent

---

**NOTICE OF INTENTION TO OPPOSE**

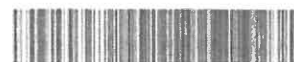
---

PLEASE TAKE NOTICE that the First and Second Respondents hereby give notice of their intention to oppose the above Application.

TAKE FURTHER NOTICE that in terms of Uniform Rules of Court (4), the first two Respondents will accept all correspondents pertaining to this matter via electronic communication to email address [Legal@uspiked.com](mailto:Legal@uspiked.com) and [Mark@uspiked.com](mailto:Mark@uspiked.com). These records must be provided in English language.

DATED at Cape Town on this 17<sup>th</sup> day of June 2021

**uSpiked**  
www.uspiked.com  
PO BOX 461  
CAPE TOWN 8001, SOUTH AFRICA



To: **The Registrar  
High Court of South Africa  
Western Cape Division  
Cape Town**

To: **The Applicants  
C/O HONEY INC. (via Email)**

And To: **CHANDRE GOOSEN-JOBERT (via Email)**

**Casper du Plessis**

---

**From:** Lorraine Mellett  
**Sent:** 22 June 2021 08:31  
**To:** Casper du Plessis  
**Subject:** FW: NRS SA BEAUTY PAGEANT - J JOHNSON - UNSPIKED - T M QUASHA - J C GOOSEN  
**Attachments:** 2597\_210621140127\_001.pdf  
**Importance:** High

Lorraine Mellett  
Secretary for RJ Britz/ CH du Plessis/ MA van Aardt

Phone:

Fax:

Email:

@honeyinc.co.za

[www.honeyattorneys.co.za](http://www.honeyattorneys.co.za)

Honey Chambers  
Northridge Mall  
Kenneth Kaunda Road  
Bloemfontein 9301  
PO BOX 29  
Bloemfontein 9300  
Docex 20  
Bloemfontein

Honey & Partners Inc. cannot ensure or guarantee that the integrity of this communication has been maintained or that it is secure or error free, as information can be intercepted, corrupted, lost and or be the subject of interference. Honey & Partners Inc. does not accept liability for any errors or omissions in the contents of this message or for any damage resulting from the opening of this message, should it contain a virus. This e-mail (and any attachments) is intended for the sole use of the nominated recipient(s), and may contain confidential and legally

privileged information. If you are not the intended recipient hereof you are requested to inform the sender upon receipt and you are hereby notified that any unauthorized review, dissemination, distribution, disclosure, use or copying of this e-mail message (and/or any attachments) is strictly prohibited. Honey & Partners Inc. will not be liable for any unauthorised use of, or reliance on, this email or any attachment. Note further that any personal views or conclusions expressed in this e-mail are those of the individual sender and the company does not endorse or accept responsibility for them.

-----Original Message-----

From: Lorraine Mellett

Sent: 21 June 2021 14:13

To: [REDACTED]@rowaninc.co.za' [REDACTED]@rowaninc.co.za>

Subject: NRS SA BEAUTY PAGEANT - J JOHNSON - UNSPIKED - T M QUASHA - J C GOOSEN

Importance: High

Letter 21.6.21

-----Original Message-----

From: scanner@honeyinc.co.za [mailto:scanner@honeyinc.co.za]

Sent: 21 June 2021 14:01

To: Lorraine Mellett [REDACTED]@honeyinc.co.za>

Subject: Attached Image

Importance: High

Phone:

(+27)

Fax:

(+27)

Email:

scanner@honeyinc.co.za

[www.honeyattorneys.co.za](http://www.honeyattorneys.co.za)

Honey Chambers  
Northridge Mall  
Kenneth Kaunda Road  
Bloemfontein 9301  
PO BOX 29  
Bloemfontein 9300  
Docex 20  
Bloemfontein



Honey & Partners Inc. cannot ensure or guarantee that the integrity of this communication has been maintained or that it is secure or error free, as information can be intercepted, corrupted, lost and or be the subject of interference. Honey & Partners Inc. does not accept liability for any errors or omissions in the contents of this message or for any damage resulting from the opening of this message, should it contain a virus. This e-mail (and any attachments) is intended for the sole use of the nominated recipient(s), and may contain confidential and legally privileged information. If you are not the intended recipient hereof you are requested to inform the sender upon receipt and you are hereby notified that any unauthorized review, dissemination, distribution, disclosure, use or copying of this e-mail message (and/or any attachments) is strictly prohibited. Honey & Partners Inc. will not be liable for any unauthorised use of, or reliance on, this email or any attachment. Note further that any personal views or conclusions expressed in this e-mail are those of the individual sender and the company does not endorse or accept responsibility for them.

# HONEY

ATTORNEYS

PER E-MAIL [REDACTED]@rowaninc.co.za

Messrs E Rowan Incorporated

Your Reference:  
ELLA ROWAN  
Our Reference:  
C H DU PLESSIS/lm

Honey Chambers  
Northridge Mall  
Kenneth Kaunda Road  
Bloemfontein 9301

PO Box 29  
Bloemfontein  
9300  
Docex 20  
Bloemfontein

Tel: 051 403 6600  
Fax 051 433 4653  
Email: jacobs@honeyinc.co.za

www.honeyattorneys.co.za

21 June 2021

Dear Sir/Madam

**MRS SA BEAUTY PAGEANT (PY) LTD / J JOHNSON // USPIKED (PTY) LTD / T M QUASHA / J C GOOSEN**

We refer to the above matter.

We take note of the Notice of Intention to Oppose that was sent to us via e-mail.

In terms of the Notice of Intention to Oppose you are acting on behalf of the "Respondent". We also received a Notice of Intention to Oppose from the First and Second Respondents and therefore enquire from you as to exactly on behalf of whom you are acting.

Your client, the Third Respondent, despite the Application being served on her, persists with her defamatory comments on social media. Should your client not refrain from placing these defamatory comments on social media we will have no alternative but to enrol the Application on an urgent basis. Kindly advise your client accordingly and request her to refrain from publishing these defamatory comments and/or any statements regarding our clients on social media with immediate effect.

We await to hear from you.

Yours faithfully,

  
**HONEY ATTORNEYS**  
**PER: C H DU PLESSIS**

**DIRECTORS:** R.J. Britz (B.lur., LL.B.) H.L. Buchner (B.lur., LL.B.) S.J. Le Roux (B.Proc.) L.B. Saffy (B.Proc.) D.J. Joubert (B.Proc., LL.B.) D.P. Rossouw (B.Comm., LL.B., Dipl. Fin. Plan.) B.M. Jones (LL.B.) A. Prinsloo (B.Comm., LL.B.) C.H. du Plessis (LL.B.) T.P. Mudzusi (LL.B., Dipl. Fin. Plan. & Adv. Fin. Plan.) D.T. Majiedt (BA Law, LL.B.) A. de Wet (LL.B., LL.M.) S. Smit (B.Comm., LL.B. AIPSA Ins. Law, Dipl. Fin. Plan.) M.A. van Aardt (LL.B., LL.M.) Y. Vosloo (LL.B.)

**CONSULTANTS:** E.F. Saffy (B.lur.) M. Odendaal (LL.B.)

**ASSOCIATES:** S.R. Mokhele (LL.B.) S. Saffy (LL.B., AIPSA Ins. Law) L. Viljoen (B.Comm. Law, LL.B., Dip. Fin. Plan.) L. Burger (LL.B.) J. Marais (B.Comm. Law, LL.B., LL.M.) M. Orffer (LL.B., LL.M.) A. Stoltz (LL.B.) J.P. Louw (B.Comm. Law, LL.B.) R. Streso (LL.B.)

Certified as a level TWO contributor to B-BBEE and a Value Adding Supplier

**HONEY & PARTNERS INC.**  
1995/002625/21

16:25



◀ Search



chandre\_ladyg 23h  
From create mode



[https://  
www.artofsuperwoman.co  
m/2017/10/13/my-side-  
of-the-story-mrs-sa/](https://www.artofsuperwoman.com/2017/10/13/my-side-of-the-story-mrs-sa/)

MRS SA IS A DISGRACE

Send message



“FA 7.1”

20:17

◀ Search



“FA7.2”

I FIND IT IRONIC THAT  
TESTIMONIALS ARE  
DONE BY WOMEN THAT  
IS NOW AGAIN BEING  
USED BY THE  
ORGANIZATIONS  
WRONG DOING .....

COVERING IT UP WONT  
WORK THIS TIME .....



20:32

◀ Search



“FA 7.3”

I WONT STOP  
EXPOSING WOMEN  
ABUSE MRS SOUTH  
AFRICA !!!!! YOU  
ARE ABUSING  
WOMEN FOR YOUR  
OWN POCKETS



“FA7.4”

8:08



“FA 7.5”



You're friends on Facebook

11 JUN, 08:27

Hi Chandre. Ek het jou post gelees oor Mev SA. Die rede waarom ek jou kontak is omdat ek al vir wyle oorweeg om self in te skryf. Iets keer my healtyd en ek weet nie wat nie. Mag ek vra wat gebeur het?

11 JUN, 08:45

Bly asb weg. Sal binnekort in media wees.

Dit breek my hart. Ek was so opgewonde. Wou so graag die platform benut vir awesome werk.

Ek verstaam maar daar sal van jou niks oorbly nie.

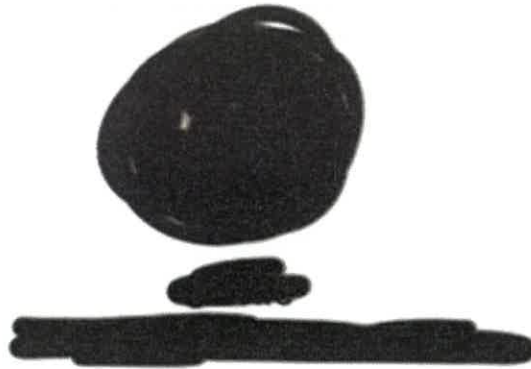
Dankie vir die waarheid.



8:07



"FA7.6"



544 followers · 907 posts

You follow each other on Instagram

You both follow clarinssouthafrica and 80 others

**View Profile**

Tuesday 15:42

Replied to your story



Only you can see this

Thank you for speaking up! All the best!  
God will protect you, this is a David vs  
Goliath story. But the righteous will prevail



Thank you sweetheart. I will make it priority  
to close it down.



Seen on Tuesday



8:07 4



"FA 7.7"



81 mutual friends, including Alfred Lewis and Sergio Zurini

WED 21:13

Hi hun saw your friend request? Do I  
perhaps know you.  
Warm regards  
Chandre

WED 21:34

Hi Chandre, no, I read your article on  
your experience with the Mrs SA pagent  
and support you so wanted to reach  
out. I feel that this should come out. I  
have experience with a lady that once  
entered and because her hubby has an  
endless pit of money she won 😊 which  
I think is absolute bullshit. So keep  
going 🌹



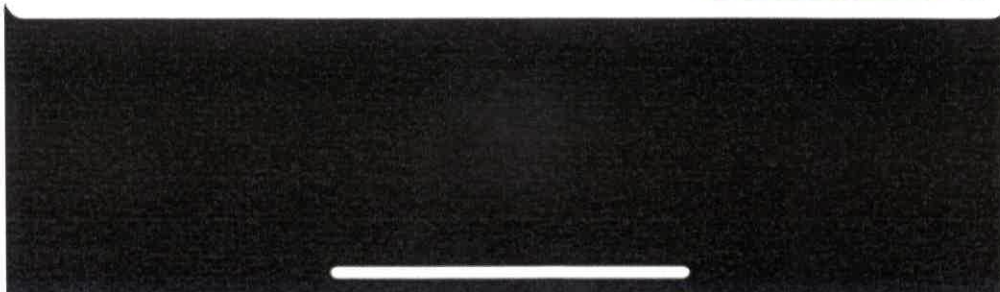
You can now call each other and see information such as Active  
Status and when you've read messages.

THU 06:36

Morning sweetheart

What

Who babe ??



8:07 4



"FA 7.8"

Wednesday 07/26

Ek sien jy follow reeds R [redacted] nie  
[redacted] wat Joani ook afgepers het  
met prokureers om stil te bly. Toe Se [redacted]  
sy Sal nie staan vir Joani agter skerms by  
judging en waarvoor die organisasie staan  
nie toe gee sy haar kroon terug en sy kry  
tot vandag toe geen erkenning dat sy ooit  
gewen het nie.

My storie het ek geen feite nie behalwe wat  
[redacted] vir my gese het en die feit dat Joani  
geweier het om vir my die finale sms  
results of judging forms wou gee nie  
ongeag hoe sy altyd preek hoe transparant  
hulle is.





21 June 2021

Your Reference  
ELLA ROMAN  
Our Reference  
C H DU PLESSIS

HONEY AT TORREY,  
PER. C & DU PLESSIS

20

Reply to chandre\_ladyg



IN THE HIGH COURT OF SOUTH AFRICA  
(WESTERN CAPE DIVISION, CAPE TOWN)

Case Number: 9742/2021

In the matter between:-

MRS SA BEAUTY PAGEANT (PTY) LTD

1<sup>st</sup> Applicant

JOANI JOHNSON

2<sup>nd</sup> Applicant

and

USPIKED (PTY) LTD

1<sup>st</sup> Respondent

THOMAS, MARK QUASHA

2<sup>nd</sup> Respondent

GOOSEN-JOUBERT, CHANDRE

3<sup>rd</sup> Respondent

**NOTICE OF INTENTION TO OPPOSE**

KINDLY TAKE NOTICE that the Respondents intend to oppose the Applicants' application, set down for hearing on 5 October 2021 and appoints the undermentioned attorneys as their attorneys of record and their address as the address for service of all documents and processes in this application.

PLEASE TAKE FURTHER NOTICE that the Respondents agree to accept service via email, during normal business hours, at the following email address:  
[ella@rowaninc.co.za](mailto:ella@rowaninc.co.za).

E. Rowan Inc. – JO0022  
Tel: 021 422 4892  
Box No: 57

**What a wonderful  
opportunity to present  
the truth** 🙌

DATED AT CAPE TOWN ON THIS THE 18<sup>th</sup> DAY OF JUNE 2021

16:25

◀ Search



“FA.7.11”



chandre\_ladyg 23h  
From create mode



[https://  
www.artofsuperwoman.co  
m/2017/10/13/my-side-  
of-the-story-mrs-sa/](https://www.artofsuperwoman.com/2017/10/13/my-side-of-the-story-mrs-sa/)

MRS SA IS A DISGRACE

Send message



16:25

◀ Search



“FA 7.12”



melissa.chnrley



but lemme guess she will also be  
labelled as a disgruntled finalist  
right @chandre\_ladyg

Instagram



charina.joubert



**Charina Joubert**



Just now · 🌐

**TO ALL MY FAMILY, FRIENDS & FOLLOWERS**

**As you may know I was a Mrs South Africa  
Finalist 2019.**

**I have decided to remove this from my platforms  
as I would like to distance myself from the  
organization!**

**I cannot associate with unethical behaviors and  
so forth!**

**I should have done this months ago - I am sorry it  
took so long to take a stand against the financial  
& emotional abuse I was put through as a  
Semi-finalist and Finalist.**

**Thank you for your continued support.**

**All my Love Charina**



*Facts*

