## IN THE SUPREME COURT OF SOUTH AFRICA (Transvaal Provincial Division)

In the matter between:-

## PAUL JOSEPH

Applicant

#### and

# THE COMMISSIONER OF THE SOUTH AFRICAN POLICE

Respondent

TO THE JUDGE PRESIDENT AND OTHER HONOURABLE JUDGES OF THE ABOVE HONOURABLE COURT

## PETITION

The Petition of

#### PAUL JOSEPH

humbly sheweth that :-

1.

Your Petitioner is PAUL JOSEPH, an Indian male, who is presently in the custody of the South African Police, having been detained in terms of Section 17 of Act No. 32 of 1963. Your Petitioner is represented herein by his wife ADELAIDE JOSEPH, who acts by virtue of a General Power of Attorney granted in her favour by Your Petitioner on the 19th day of August, 1964.

#### 2.

The Respondent is the COMMISSIONER OF THE SOUTH AFRICAN POLICE, PRETORIA, who is cited in his capacity as the person in command and control of the South African Police.

#### 3.

Your Petitioner was arrested in JOHANNESBURG on the 6th day of July, 1964, and since then has been detained in JOHANNESBURG and PRETORIA pursuant to the provisions of Section 17 of the aforementioned Act No. 32 of 1863.

## 4.

Your Petitioner's wife is not of right entitled to access to her husband whilst he is being detained as aforesaid, and is only entitled to see him with the consent of the Minister of Justice or a commissioned efficer of the South African Police. For this reason the present application has been brought by Your Petitioners wife pursuant to her aforementioned authority, and is based largely on hearsay information supplied to her.

#### 5.

(a)

On or about the 9th day of JULY, 1964, Your Petitioner's wife was permitted, with the consent of the police authorities, the see Your Petitioner at his place of detention. She was not, however allowed to talk to him about his conditions of detention or about his health or anything else, other than family and business affairs. At the interview Your Petitioner appeared to be in good health.

(b)

Approximately two weeks later Your Petitioner's wife was once more permitted to see your Petitioner. Your Petitioner looked tired and his eyes were bloodshot and he appeared to be ill. Your Petitioner's wife asked him why he looked ill, whereupon he looked in the direction of the police officials who were present at the interview and merely said, "Maybe if I tell you

This application was based upon a note, which formed an exhibit in the proceedings hereinafter mentioned. The Deponent, IVAN SCHERMBRUCKER, stated, after describing how, many detainees, including himself, were kept standing on their feet continuously for anything from between 12 hours to 36 hours, that "at one stage | nearly committed bloody suicide by jumping out of the window." Shortly thereafter, and on or about the 10th SEPTEMBER, 1964, a 90-day detainee, one SULIMAN SALOOJEE, did, in fact, commit suicide, while being interrogated, by jumping out of the window of THE GRAY'S Building at JOHANNESBURG. Your Pethioner's wife is most concerned about the safety of Your Petilioner and fears that if he, too, is interrogated in the manner described, he might also attempt to commit suicide.

11.

On the 6th OCTOBER, 1964, Your Petitioner's wife was once more permitted to visit Your Petitioner at the PRETORIA GOAL. Although the interview was conducted in the presence of members of the Special Branch, Your Petitioner was able to address the Deponent as follows, or words to that effect, when the attention of the Special Branch man was diverted. "We are going through real hell, especially SOLLY MATTHEWS. I cannot even tell you what all they have done to him. Also they are torturing an African parson by the name of WILTON MAKWAI. It is sometimes absolutely unbearable. They want me to give evidence for the State." Your Petitioner was about to tell Your Petitioner's wife what was being done to him when the Special Branch men's attention was directed at him and he could not say anything further. The SOLLY MATTHEWS referred to by Your Petitioner is an Indian male who was arrested at the same time as Your Petitioner. Since his arrest, more than 90 days age and detention under Section 17 of the aforementioned Act, nobody at all has seen him, but allegations have been made that he has been assaulted on numerous occasions by the police. YourPetitioner's wife has no knowledge of the Wilton Makwai mentioned by Your Petitioner.

12.

Your Petitioncr's wife has interviewed her attorney, MR. JOEL JOFFE, once more and placed all the aforementiomed facts before him. He advised her that in view of the additional facts which were placed before him, and also having regard to the facts set out in his Affidavit (Annexure "H" hereto), that there would be some basis upon which an application could be made to Court, but warned Your Petitioner's wife that in his view a danger existed that she herself might be detained as a result of these allegations. He accordingly advised her to think about the position for a few days, particularly as Your Petitionar's wife is in need of medical attention and is the mother of a spastic child who is entirely dependent upon her and Your Petitioner. Your Petitioner's Wife, however, after careful thought and consideration during the past few days, decided that it is her duty to Your Petitioner to place these facts before the Court regardless of the consequences to herself, and even though she fears that the allegations themselves might lead to reprisals being taken against both Your Petitioner and herself, and has instructed that this application be proceeded with as a matter of urgency.

13.

Your Petitioner further submits that the police are incorrect when they allege that they are entitled to interrogate persons in the manner set out in Annexures "A" to "G". More particularly, Your Petitioner refers to paragraph 5 of Annexure "B" hereto, where the Deponent, NORMAN LEVY, states,

"When I confronted one of the detective sergeants with the crue! nature of the method of interrogation (meaning the virtual torture of making the victim stand up), he replied that the number of consecutive hours during which a detainee may be questioned at one session had never been stipulated. He suggested, jokingly, that I might be the first to test the matter in the Courts".

Your Petitioner draws attention to the failure of the Respondent even to deny the allegations contained in Annexures "J" and "L" which are hereinafter referred to.

14.

- On the 25th SEPTEMBER, 1964, a letter was addressed by your Petitioner's attorney to the Respondent, (a) calling upon the Commissioner to cease interrogation of the nature described in that letter and also asking for an undertaking that this method of interrogation would cease. A copy of this letter is annexed hereto marked Annexure "J",
- (b) On the 29th SEPTEMBER, 1964, a letter was received from the Respondent asking for further details, and a copy of this letter is annexed herets marked Annexure "K".
- (c) On the 2nd OCTOBER, 1964, a further letter was addressed to the Respondent giving him the information requested and asking for the undertaking immediately. (A copy of this letter is annexed hereto marked "L"). No reply has been received to this letter, nor has the undertaking requested been given, nor has the Respondent even denied that interrogation of the nature described is taking place.

ANNEXURE "A"

IN THE SUPREME COURT OF SOUTH AFRICA TRANSVAAL PROVINCIAL DIVISION.

In the matter of -

5

Applicant

and

THE COMMISSIONER OF THE SOUTH AFRICAN POLICE

Respondent

## AFFIDAVIT

I, the undersigned,

#### CONSTANTINOS GAZIDES

do hereby make eath and say that :-

1.

I am a medical practitioner and hold and M.B. B. Ch. (Wits) degree and am 28 years of age.

2.

I am an awaiting trial prisoner at the Fort, JOHANNESBURG, and was detained by the Police under the provisions of Section 17 of Act No. 32 of 1963 on the 3rd July, 1964.

#### 3.

On the 3rd AUGUST, 1964, two members of the Security Police took me from Preteria Local Prison to an office in Compol Building, the headquarters of the Security Branch in Pretoria. It was about 8.30 a.m.

4.

At that moment one of the detectives entered the office. He had a piece of chalk in his hand. He proceeded to draw a square with sides of about 18 inches on the linoleum floor with it. The square was placed away from the desk, the chairs and wall of the room. I could see the faded lines of a similar square on the floor, which they at a later stage told me had been someone else's "home". The detective then said to me that I was to stand in that square he had drawn and not to move out of it. He added jokingly that that was to be my "home" until I was prepared to make a statement.

5.

For the rest of the day and until 8 p.m. that evening the two members of the Security Police mentioned In paragraph 3 above were my main interrogators, but on several occasions other members of the Special Branch would come in and make remarks. At one stage there were seven Special Branch men in the room. These occasional visitors were responsible for the abuse and insulting remarks to which I was subjected. Threats of assault and using torture were made. The main culprit in this respect was one of the sergeants, who became very heated at one stage, accusing me of being directly responsible for the bomb explosion at the Johannesburg Station. He also mentioned a motto of the Gestapo, "Get your man. It's not important if he 's guilty or innocent. Bet him to confess." He also said to a colleague so that I could overhear, that they should have me standing one steel plate connected to a source of current, so that he could press a button and watch me jump.

: 6.

The discussions were in general full of hatred against Communists, Africans, the African States, the United Nations, England, Liberals, the English Press, Jews, the United and Progressive Parties, and, of course the Congress Alliance. I can enlarge on their comments if necessary.

7.

Towards 6 p.m. of that afternoon, one of the Special Branch members mentioned in paragraphs 3 and 5 above, said that he did not like to see me torture myself like this, that it was bad for my health and that he could not understand why I was doing It. He repeated this several times during the following day. At this stage a Warrant Officer from Durban entered the room and said that he was going to take the night shift of twelve hours ( 8 p.m. to 8 a.m.) with amother member of the Durban Security Branch.

ANNEXURE "B"

THE SUPREME COURT OF SOUTH AFRICA TRANSVAAL PROINCIAL DIVISION.

In the matter of

PAUL JOSEPH Applicant

THE COMMISSIONER OF THE SOUTH AFRICAN POLICE

Respondent

AFFIDAVIT

- 7 -

1, the undersigned,

do hereby make oath and say that :-

· 1.

I am a school teacher and the vice-principal of a school. Before being charged I was detained for a period of 54 days in solitary confinement under the provisions of Section 17 of Act No. 72 of 1963.

2. On the 27th JULY, 1964, I was called out of my cell at about 9.30 a.m. and was taken to Compol Building, the offices of the Security Branch in Pretoria, by two detectives whose names I do not remember. I was escorted to a large room on the ground floor and told to stand in the centre of the room. Approximately nine detectives confronted me. I was shown a copy of the "Sunday Times" of the 25th JULY which featured on its front page pictures and news of a bomb explosion at the Johannesburg Station on the afternoon of the 24th July. I said I had nothing to do with the Incident and, as I was not aware of any charge or charges that could or might be laid against me, I was not prepared to answer any questions or make any statement to them, as these might prejudice my position in the event of a trial.

3.

I was struck on the back of the head with the newspaper, abused by offensive language and anti-semitic remarks and told that I would not be allowed to leave the building until such time as I had satisfied the Police Commissioner with a full statement of my "subversive activities", My spectacles were removed and I was ordered to remain standing in the centre of the room.

4.

5.

After about three hours I was confronted with various acts and associations with people and with having attended a particular meeting on the 16th June, 1964. I refused to admit anything and simply stood in the centre of the room as instructed. A square was drawn with chalk, and I was told not to move out of it or sit down unless I intended making a statement. In the meanwhile pairs of detectives continued to confront me with various acts and associations with banned or listed people.

At 4 p.m. on the afternoon of the 27th JULY, the interrogating team split into pairs and interrogated me by throwing "facts" at me for stretches of four hours at a time, All the detectives present took part in the interrogation. I remained standing all the time. When I confronted one of the detective sergeants with the cruel nature of the method of interrogation (meaning the virtual torture of making the victims stand up), he replied that the number of consecutive hours during which a detainee may be questioned at one session had never been stipulated. He suggested, jokingly, that I might be the first to test the matter in the Courts.

6.

The same procedure continued throughout the night. I advised each interrogating team that I had a cardiac complaint and that I was not feeling very well. Their reply was that I was punishing myself by being so obstinate in not making a statement.

7.

The interrogation continued for 42 consecutive hours, cotil 3 o'clock of the morning of WEDNESDAY, the 29th JULY. My limbs were numb and I could hardly lift my mouth to eat my food (which I had to take in a standing position). When I obtained permission to go to the clockroom I was able to drag my feet and walk in a crouched position with my knees bent. The short journey of ten paces to the lavatory was a laborious and painstaking operation.

8.

After the change in shifts on WEDNESDAY, the 29th, I was feeling very ill and fatigued. Severe pains in my shoulders, back and stomach made me stagger and stand uneasily on my feet. I felt as if I was going to faint. Two policemen were on duty. They refused to let me sit down, but allowed me to have a drink of water. At this point I decided to make a short statement. I was then taken back to the Pretoria Local Goal.

9.

About 9 o'clock of the said morning, 29th JULY, 1964, I was ordered out of my cell to see the Security Branch detectives who were waiting downstairs in the passage to see me. I told the warder who had come to fetch me that I was feeling ill and wished to see a doctor and that I could not go downstairs. The warder refused to accept my statement and made me dress with the aid of a second constable who held me up under the arms.

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ANNEXURE "C"

IN THE SUPREME COURT OF SOUTH AFRICA TRANSVAAL PROVINCIAL DIVISION.

In the matter of

PAUL JOSEPH, Applicant

and

THE COMMISSIONER OF THE SOUTH AFRICAN POLICE. Respondent

AFFIDAVIT

I, the undersigned,

## PAUL HENRY TREWHELA

do hereby make oath and say that :-

1.

1 am 22 years of age and hold a Bachelor of Arts Degree and am a journalist by profession.

2.

I was arrested on FRIDAY, the 3rd JULY, 1964, and detained from the 4th JULY at the Pretoria Local Prison, having spent the previous night in PRETORIA CENTRAL PRISON.

3.

I was not interrogated by the Security Branch until TUESDAY, the 22nd JULY, when I was required to stand for one hour while three detectives interrogated me in an office at PRETORIA LOCAL PRISON.

4. Throughout the interregation which lasted anout an hour from 2.30 p.m. to 3.30 p.m. the three detectives sat, stood up and moved about while I was forced to stand in one spot before tham.

## 5.

I was again called from my cell the next day, WEDNESDAY the 22nd JULY at about 8 a.m. and driven to Compel Buildings by four detectives from the Grays, JOHANNESBURG. As somn as we arrived at Compol Buildings, I was taken to a large room on the ground floor. I was immediately told to stand in a corner of the room by a detective sergeant and told that I would not be allowed to sleep or sit down until I had made a statement to the satisfaction of the Police Commissioner. I refused to make any statement. At about noon I was brought lunch from the prison and sat down on the brown Linoleum coloured floor to eat it. I was immediately hauled up firmly, but not roughly by another detective sergeant. I sat down again three times and was hauled up three times. I then realised that the police were serious about forcing me to stand and that it was useless to challenge their command. I ate the rest of my meal standing.

6.

From 8 a.m. on Wednesday, the 22nd JULY until 5 a.m. on SATURDAY, 26th JULY, when I was returned to my cell, a period of 69 hours in all, I was interrogated. During this time I was able to get about four hours of sleep at scattered intervals. I was also able to sit down for a total of about 12 hours. But these were definitely concessions, and as time want by the interrogators became stricter in enforcing their conditions.

7.

I began to feel tired after standing four hours on the 22nd JULY. By 4 p.m. that afternoon I began to feel the muscles of my back tautening and by 8 p.m. when my legs were stiff, I took the chance of lying down for a few minutes. My interrogators on that shift allowed me to sleep for two snatches, one of I5minutes and another for about 20 minutes. I felt enormously refreshed after both. From than on I gradually became numb physically and mentally, until by the third day I would only become alert after a brief rest, after having splashed my face with water leaving the lavatory, or when my interrogators were discussing something interesting among themselves. After standing for about 60 hours my ankles began to swell and my legs became stiff, despite continual leg motions to keep the blood circulating.

8.

One of the policemen warned me early that the Security Police would make a physical and mental wreck of me if I persisted in refusing to make a statement. Throughout the questioning that followed, various techniques were used to break my resistance. A policeman would stand behind me as I moved my legs, tapping in time with a pencil so that I would become rapt with a weary hypnosis. Detectives would try and confuse me with a welter of contradictory accusations and attitudes. One man would swear at me saying I was a coward for having done something, while the next minute another detective would say he admired my courage in refusing to give in, but that it was a lost cause. One of the inquisitors would say that he only wanted to help me, while another would swear to crush me.

9.

I was eventually returned to my cell at POETORIA LOCAL PRISON at 5 a.m. on the morning of SATURDAY, the 25th JULY after 1 had convinced one of the detctive sergeants that 1 had no intention of making a statement.

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ANNEXURE "D"

## IN THE SUPREME COURT OF SOUTH AFRICA TRANSVAAL PROVINCIAL DIVISION

In the matter of -

PAUL JOSEPH Applicant

THE COMMISSIONER OF THE SOUTH AFRICAN POLICE. Respondent.

AFFIDAVIT

I, the undersigned,

## IVAN FREDERICK SCHERMBRUCKER

and

do hereby make oath and state that :-

1.

I am a businessman presently being detained as an awaiting trial prisoner at the Fort, Johannesburg

2.

I was detained by the police under the provisions of Section 17 of Act No. 32 of 1963 on the 23rd July, 1964.

3.

During my detention I was taken from FORDSBURG POLICE STATION one day at lumchtime and taken to the GRAYS and immediately on arrival there, I was told to stand and the interrogation began. There were no less than two persons, and almost all the time at least four or five, and after for long periods at a time I think between seven to nine persons.

During the entire investigation, I was sworn at almost all the time. I was called a "fucking communist", "bastard swine", and s? on. I was told that I was traitor to my country and that it was my duty to give the police as much information as possible. I was shown a copy of the "Sunday Times" newspaper of a story and pictures of a bomb blast that apparently had taken place a few days beforehand at Park Station, JOHANNESBURG. I was told that it was people like me who were directly responsible for such actions - such an allegation I vehemently denied and I said that I hated and abhorred such a dreadful wanton act. I completely condemned the act. The police, nevertheless, continued with the allegation that it was because of people like me that sabotage had taken place; that it was people like me who interfered with the Bantu and tried to cause unrest and dissatisfaction amongst them. At one stage one policeman kept tapping me under the chin, telling me to look up. At one stage, he also grabbed me by my jacket lapels and shook me.

A lieutenant constantly said that he would like to strike me right between the eyes and knock me senseless. Frightful abuse continued all the time. I was constantly told by a certain officer that if I feel down he would urinate on me and drag me up again"; that he would keep up this treatment endlessly until I talked.

The first evening I was given a plate of food and told to eat it, still standing, of course. I did not eat. From lunch time, the first afternoon till the following morning about 8.30, I did not move, and then was allowed to drag myself painfully off to the lavatory for a few minutes.

I was then told to stand again. Not long after this I collapsed and fell to the floor, and water was thrown over me. I tried to get up, but fell again. I must havelain on the floor a few minutes, when I was made to get up and stand again. Shortly after I was given some breakfast, which I did not eat.

I continued standing until lunch time when I was given lunch and allowed to sit and eat it. This took a few minutes and then I was standing again, and continued standing until about 3.30 to 4 p.m.

4.

I would be able to identify the policemen who interrogated me, some of whose names were MR. ERASMUS, CAPTAIN SWANEPOEL and LIEUTENANT MULLER.

5.

The above does not purport to be a complete description of my interrogations and treatment while I was detained, but is merely what I have been requested to incorporate in this Affidavit.

#### sgd. I, F. SCHERMBRUCKER.

I certify that the deponent has acknowledged that he knows and understands the contents of this Affidavit.

THUS SIGNED and SWORN TO at JOHANNESBURG on this the 13th day of OCTOBER, 1964.

#### BEFORE ME,

sgd. P. DAVIDSON COMMISSIONER OF OATHS ATTORNEY - TRANSVAAL.

ANNEXURE "F"

#### IN THE SUPREME COURT OF SOUTH AFRICA TRANSVAAL PROVINCIAL DIVISION.

In the matter of -

# PAUL JOSEPH Applicant

THE COMMISSIONER OF THE SOUTH AFRICAN POLICE. Respondent

#### AFFIDAVIT

1, the undersigned,

HUGH FRANCIS LEWIN

do hereby make oathand say that :-

I am a journalist by profession and am presently an awaiting trial prisoner being detained at the Pretoria Local Goal.

1.

2.

:3.

I was arrested on the 9th JULY, 1964, and detained for over two months in terms of the provisions of Section 17 of Act. No 32 of 1963.

Shortly after my arrest I was taken to the Grays Building, JOHANNESBURG, which contains offices of the Security Branch of the South African Police. There I was interrogated by a few policemen from about 5.30 p.m. in the evening until about 8 a.m. the next morning. The policemen questioned me in shifts and slept from time to time, but I was made to stand continually throughout the inverrogation during which many threats and much anti-semitic abase was levelled at me. The team of policemen included Linctenant v.d. MERWE, Lientecant VIKTER and Capt. SWANEPOEL.

4.

On the 24th July, 1964, I was once more taken to the Grays Bailding by Lt. VAN DER MERWE and Lt. VIKTER in the evening. I was ushered into a room and Lieutenant VAN DER MERWE came straight to me, pulled off my spectacies and threw them on to a table. I began to plead with him but he ignored me and began hitting me with his fists, mainly in the face and on the head. I was assaulted at some length, but have been advised that for the purposes of this Affidavit it is not necessary to give a full description of the assault or what else happened to me.

5.

The above does not purport to be a full description of my interrogations or treatment whilst under 90-day.

#### agd. H. LEWIN

I certify the Deponent has acknowledged that he knows and understands the contents of this Affidavit.

THUS SIGNED AND SWORN TO at PRETORIA on the 13th day of OCTOBER, 1964.

BEFORE ME

sgd. van Staden Head Warder No. 9483 COMMISSIONER OF OATHS TRANSVAAL. 15 -

ANNEXURE "H"

## IN THE SUPREME COURT OF SOUTH AFRICA TRANSVAAL PROVINCIAL DIVISION

In thematter of -

## PAUL JOSEPH Applicant

and

THE COMMISSIONER OF THE SOUTH AFRICAN POLICE. Respondent

#### AFFIDAVIT

I, the undersigned,

## JOEL GOODMAN JOFFE

do hereby make oath and say that :-

## 1.

1 am an Attorney of this Honourable Court, practising as such at 205, National Mutual Buildings, 41, Rissik Street, Johannesburg.

#### 2.

During the past year, I have acted for a large number of persons who have been detained by the police under the provisions of Section 17 of Act No. 32 of 1963. During the course of my duties, I have taken secres of statements from persons previously detained under the said Act, and also attended almost every sabotage trial in the Transvaal during that period.

#### 3.

In almost every sabotage case that I have appeared in, certain witnesses for the State ( not the Defence) have, under oath testified that they were assaulted by the Police Authorities while they were being detained under the provisions of the said Act. The trials in question which I can remember offhand are :

- 1. <u>The State vs. Caleb Matshabe</u>, heard in the Transvaal Provincial Division in November-December, 1963 (several State witnesses testified to assaults on them by the police, including a certain S. MONTWEDI and H. SITILO).
- 2. The State vs. NELSON MANDELA and OTHERS, heard in the Transvaal Provincial Division in 1963 - 1964. (One State witness only testified as to an assault upon him, but it must be mentioned that according to the Prosecutor he subsequently stated he did not want the matter to be taken any further),
- The State vs. Martin Ramokgadi and Others, heard in the Witwatersrand Local Division during 1964 (at least one witness testified to assaults on him by the police, the name of the witness being K. PELCO).
- 4. <u>The State vs. Andrew Mashaba and Others</u>, heard in the Transvaal Provincial Division during 1964 ( in this case several State witnesses testified that they were assaulted while being detained by the police and, in fact, at least one of them, a certain MOSUPYE, said that assaults of this nature were so common that it was ludicrous to suggest otherwise).

## 5.

I have read the Petition and confirm that insofar as it deals with interviews between Petitioner's wife and myself, the fact therein stated are true and correct.

#### sgd, J.G. JOFFE.

I certify that the Deponent has acknowledged that he knows and understands the contents of this Affidavit.

THUS SIGNED and SWORN TO at JOHANNESBURG on this the 13th day of OCTOBER, 1964.

#### BEFORE ME.

sgd. M. ZIMERMAN COMMISSIONER OF OATHS ATTORNEY - TRANSVAAL.

# PHOTOSTAT COPY

SUID-AFRIKAANSE POLISIE Privaatsak ) Private Bag )

4

ANNEXURE "K"

S.A.P. 51 No. C. 8/573 SOUTH AFRICAN POLICE

> HOOFKANTOOR Head Office

> > PRETORIA.

29-9-1964

Messrs. Hayman & Aronsohn, P.O. Box 7390 JOHANNESBURG.

Sirs,

I have to acknowledge receipt of your letter dated 25.9.64 and to inform you that if you inform me who your clients are and who the interrogated persons are, this matter will receive further attention.

Yours faithfully,

THE COMMISSIONER OF THE SOUTH AFRICAN POLICE.

ANNEXURE "L"

MR. JOFFE C. 8/573

2nd October, 1964

The Commissioner of the South African Police, Private Bag 94, PRETORIA

Dear Sir,

## Re : DETAINEES - YOUR REF. AS ABOVE

We thank your for your letter of the 29th September 1964.

The detainees whom we were consulted about included :

Mr.	Η.	Lewin
Mr.	Hi	rson
Mr.	Α.	Cajee
Mr.	Ρ.	Joseph.

The first two persons have now been charged, but the others are still being detained.

We must ask you to give this matter your urgent attention, as unless we receive the required undertaking by Monday the 5th day of October 1964 we shall immediately bring an application to the Supreme Court in Pretoria.

Yours faithfully, HAYMAN & ARONSOHN

JJ/DM

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