

**IN THE SUPREME COURT OF APPEAL
HELD AT BLOEMFONTEIN**

SCA case number: 711/2019
GJ Case number: 13348/2019

In the application of:

MEDIA MONITORING AFRICA TRUST

Applicant for admission
as an *amicus curiae*

In the matter between:

ECONOMIC FREEDOM FIGHTERS

First Applicant

MBUYISENI QUINTIN NDLOZI

Second Applicant

JULIUS SELLO MALEMA

Third Applicant

and

TREVOR ANDREW MANUEL

Respondent

**NOTICE OF MOTION:
APPLICATION FOR ADMISSION AS AN *AMICUS CURIAE* IN TERMS OF
RULE 16(4) OF THE RULES OF THE SUPREME COURT OF APPEAL**

KINDLY TAKE NOTICE THAT the applicant for admission as an *amicus curiae* applies to this Court for an order in the following terms:

1. Admitting Media Monitoring Africa as an *amicus curiae* in the appeal;
2. Granting Media Monitoring Africa —
 - 2.1. the opportunity to file written submissions in the appeal; and
 - 2.2. the opportunity to present oral argument at the hearing of the appeal,

provided that such argument does not repeat matters set forth in the arguments of the parties;

3. Costs against any party that opposes this application;
4. Further and/or alternative relief.

TAKE FURTHER NOTICE that the affidavit of **WILLIAM ROBERT BIRD** and the annexures thereto will be used in support of this application.

TAKE FURTHER NOTICE that the applicant for admission as an *amicus curiae* has appointed the address of its correspondent attorneys, Honey Attorneys, at Honey Chambers, North Ridge Mall, Kenneth Kaunda Road, Bloemfontein, as the address at which it will accept notice and service of all process in these proceedings. Electronic service will also be accepted at the following email addresses: avani@powersingh.africa / michael@powersingh.africa / tina@powersingh.africa.

Dated at JOHANNESBURG on this 5th day of March 2020.



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In the application of:

MEDIA MONITORING AFRICA TRUST

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and

TREVOR ANDREW MANUEL

Respondent

FOUNDING AFFIDAVIT

I, the undersigned,

WILLIAM ROBERT BIRD

hereby make oath and state:

1. I am an adult male, and the Director of Media Monitoring Africa (“MMA”), a not-for-profit organisation with registered offices at Suite No. 2, Art Centre, 22 6th Street, Parkhurst, Johannesburg.

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2. I am duly authorised to bring this application and to depose to this affidavit on behalf of the MMA Trust.
3. The facts to which I depose are true and correct and are within my personal knowledge, except where it is apparent from the context that they are not. Where I make submissions of law, I do so on the advice of MMA's legal representatives.
4. This is an application in terms of Rule 16(4) of the Rules of the Supreme Court of Appeal ("**the Rules**"), in terms of which MMA seeks leave to be admitted as an *amicus curiae* in this matter.
5. In line with MMA's particular areas of interest and expertise, and fully cognisant of the duty of an amicus not to repeat any of the submissions that have already been canvassed by the parties, MMA's proposed submissions are narrowly tailored to three key issues of relevance to the present matter:
 - 5.1. **First**, the relevance and impact of disinformation in striking the appropriate balance between the right to freedom of expression and the rights to dignity and reputation, in the context of adjudicating defamation matters;
 - 5.2. **Second**, the proper approach to be taken towards the notion of the "reasonable reader" in the context of social media; and
 - 5.3. **Third**, the importance of appropriate, effective and expeditious remedies in defamation proceedings relating to online publications.
6. In line with these proposed submissions and Rule 16(6) of the Rules, this affidavit is structured as follows:
 - 6.1. **First**, the interest that MMA has in this matter; and
 - 6.2. **Second**, a brief overview of the submissions that MMA proposes to advance in this matter, including their relevance to the proceedings and the reasons

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for why the submissions will be useful to the Court and different from those of the other parties.

7. In compliance with the Rules, MMA wrote a letter to the parties requesting consent for MMA to be admitted as an *amicus curiae* in this matter. This letter is attached hereto marked “WRB1”.

7.1. On 4 March 2020, the respondent provided MMA with consent to its request to be admitted as *amicus curiae*. This letter is attached hereto marked “WRB2”.

7.2. No response has yet been received from the applicants. If one is provided, this will be placed before this Court via a supplementary affidavit.

MMA’S INTEREST IN THE PROCEEDINGS

8. MMA is a not-for-profit organisation that operates in the public interest to promote the development of a free, fair, ethical and critical media culture in South Africa and the rest of the continent. To avoid unduly burdening these papers, I have not attached the MMA Trust Deed, but it will be provided should the need arise.

9. In the last 27 years, MMA’s work has consistently related to key human rights issues, always with the objective of promoting democracy, human rights, and encouraging a just and fair society. MMA has and continues to play an active role in media monitoring and seeks to proactively engage with media, civil society organisations, state institutions and citizens, and in doing so advocates for freedom of expression and the responsible free flow of information to the public on matters of public interest.

10. MMA has a keen interest in navigating the appropriate balance to be struck between freedom of expression and other competing rights and interests, as is evidenced by its involvement in a range of policy, legislative and advocacy processes. Notably, MMA has made a variety of submissions that relate to the triad of information rights which include the rights to privacy, freedom of expression and access to information. These include submissions to:

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- 10.1. The Department of Justice and Constitutional Development the draft bill on the Prevention and Combatting of Hate Crimes and Hate Speech Bill;
 - 10.2. The Information Regulator on the Draft Regulations of the Personal Information Act 4 of 2013;
 - 10.3. The Select Committee on Security and Justice of the National Council of Provinces on the Cyber Crimes Bill;
 - 10.4. The Portfolio Committee on Justice and Correctional Services on the Promotion of Access to Information Amendment Draft Bill;
 - 10.5. The Competition Commission on the Data Services Market Inquiry;
 - 10.6. ARTICLE 19 on the consultation paper regarding Social Media Councils; and
 - 10.7. The Independent Communication Authority of South on the Discussion Document on the Market Inquiry into Mobile Broadband Services in South Africa.
11. Further to this, MMA has participated in numerous matters as a party or an *amicus curiae*, including the following:
- 11.1. As an applicant before the Constitutional Court in *Centre for Child Law v Media 24 Limited*,¹ in which the best interest of the child and their rights to equality, privacy and dignity were balanced against freedom of expression and the principle of open justice;

¹ *Centre for Child Law and Others v Media 24 Limited and Others* [2019] ZACC 46.

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- 11.2. As an *amicus curiae* before the Supreme Court of Appeal in *Van Breda v Media 24*,² where it advanced arguments the regarding appropriate circumstances under which the right to freedom of expression can be limited, particularly when it is necessary to protect the rights of vulnerable persons, especially children;
- 11.3. As an *amicus curiae* before the Constitutional Court in *South African Human Rights Commission on behalf of South African Jewish Board of Deputies v Masuku*,³ where it considered section 16 of the Constitution, and the interplay with the right to offend, shock and disturb, taking into account South Africa's repressive history of speech regulation; and
- 11.4. As an *amicus curiae* before the Constitutional Court in *Amabhungane Centre for Investigative Journalism NPC and Another v Minister of Justice and Correctional Services and Others*,⁴ where it advanced arguments for the protection of children and civil society actors in the context of South Africa's current surveillance regime which unjustifiably infringes on the right to privacy and associated constitutional rights, including freedom of expression.
12. MMA has also done extensive work around disinformation and how to combat it.
- 12.1. Of notable reference was MMA's partnership the Independent Electoral Commission to develop a platform to fight digital disinformation during the 2019 election period. MMA has further developed this platform, known as the Real411 (<https://www.real411.org.za>), which enables members of the public to report disinformation in the interests of accountability and transparency.

² *Van Breda v Media 24 Limited and Others; National Director of Public Prosecutions v Media 24 Limited and Others* [2017] ZASCA 97.

³ *South African Human Rights Commission on behalf of South African Jewish Board of Deputies v Masuku* CCT 14/19.

⁴ *Amabhungane Centre for Investigative Journalism NPC and Another v Minister of Justice and Correctional Services and Others; Minister of Police v Amabhungane Centre for Journalism NPC and Others* CCT 278/19 and CCT 279/19.

- 12.2. Also of note in this regard, I was invited to participate in an expert group on disinformation hosted by the University of Essex along with academics, civil society and United Nations (UN) bodies (including the UN Office of the High Commissioner for Human Rights and the UN Educational, Scientific and Cultural Organization).
- 12.3. Most recently, I was invited to speak at workshop hosted by the Independent Electoral Commission and the UN Development Programme on combatting disinformation in elections in Africa.
13. The present matter raises important questions related to new media platforms, in particular social media platforms, and the tension between freedom of information and the publication of defamatory content. Social media platforms facilitate the exchange of information and ideas from diverse sources and create space for people to exercise their right to freedom of expression. However, with these new platforms, new challenges have arisen in terms of the spreading of wrongful and harmful publications. As a result of these challenges, there is a need for courts to grant appropriate, effective and expeditious remedies for persons who have been defamed online.
14. MMA respectfully submits that it well-placed to provide this Court with assistance regarding the legal issues that arise in this regard in the context of the present appeal.
15. Moreover, given MMA's established track record of acting in the public interest in matters relating to the advancement of the constitutional right to freedom of expression and competing rights, MMA respectfully submits that it would be of assistance to the Court for it to be provided with legal submissions that do not emanate from only the parties to this dispute.

POSITION TO BE ADOPTED BY MMA IN THE APPEAL

16. If admitted as an *amicus curiae*, MMA seeks to focus on three discrete issues, which MMA respectfully submits will be of use to the Court in its adjudication of this matter:

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- 16.1. **First**, the relevance and impact of disinformation in striking the appropriate balance between the right to freedom of expression and the rights to dignity and reputation, in the context of adjudicating defamation matters;
- 16.2. **Second**, the proper approach to be taken towards the notion of the “reasonable reader” in the context of social media; and
- 16.3. **Third**, the importance of appropriate, effective and expeditious remedies in defamation proceedings relating to online publications.

Relevance and impact of disinformation

17. Social media platforms present unique challenges regarding the dissemination and publication of information online. This is of particular concern where there is publication of false and wrongful information – such as disinformation – that may be damaging or harmful to the dignity and reputation of one or more persons.
18. It is for this reason that MMA seeks to address the proper definition of disinformation, as well its distinction from other key concepts, such as political speech and comment. Furthermore, in addressing these issues, MMA will focus in particular on the relevance and impact that online disinformation has when seeking to strike the correct balance between freedom of expression and the common law principles of defamation in the digital era.
19. It is trite that the law of defamation contemplates a tension between two fundamental rights: the right to freedom of expression, on the one hand, and the right to dignity and reputation, on the other. MMA submits that navigating this tension has become increasingly complex in a digital setting, particularly in relation to the rise of social media platforms and the growing threats of the online dissemination of disinformation. These multi-faceted challenges necessitate a shift in understanding, especially in the context of political discourse and matters of public importance. In particular, the growing trend of disinformation and its consequences need to be taken into account when considering the limitation of freedom of expression in the context of defamation proceedings, particularly

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in respect of the defences of truth and public interest, protected comment and reasonableness.

The reasonable reader in the context of social media users

20. In determining who would be considered the ordinary reasonable reader on social media, the court *a quo* found that, in the present matter, the hypothetical ordinary reader must be taken to be a reasonable representative of users of Twitter who follow the Economic Freedom Fighters and Mr Malema and share his interest in politics and current affairs.
21. MMA submits that in the context of social media, the proper understanding of the reasonable reader is critical. In this regard, MMA seeks to rely on comparative jurisprudence, including the United Kingdom judgment in *Stocker v Stocker*,⁵ in which it was held that:

“The advent of the 21st century has brought with it a new class of reader: the social media user. The judge tasked with deciding how a Facebook post or a tweet on Twitter would be interpreted by a social media user must keep in mind the way in which such postings and tweets are made and read.”⁶

22. The court in that matter relied on *Monroe v Hopkins*, which provided guidance on engaging with Twitter posts, wherein the Court noted:

“The most significant lessons to be drawn from the authorities as applied to a case of this kind seem to be the rather obvious ones, that this is a conversational medium; so it would be wrong to engage in elaborate analysis of a 140 character tweet; that an impressionistic approach is much more fitting and appropriate to the medium; but that this impressionistic approach must take account of the whole tweet and the context in which the ordinary reasonable reader would read that tweet.

⁵ *Stocker v Stocker* [2019] UKSC 17.

⁶ *Id* at para 41.

That context includes (a) matters of ordinary general knowledge; and (b) matters that were put before that reader via Twitter.”⁷

23. The Supreme Court in *Stocker* endorsed this and held:

“The imperative is to ascertain how a typical (ie an ordinary reasonable) reader would interpret the message. That search should reflect the circumstance that this is a casual medium; it is in the nature of conversation rather than carefully chosen expression; and that it is pre-eminently one in which the reader reads and passes on.”⁸

24. There are varying considerations regarding how courts, in the context of online defamation, should understand the reasonable reader. MMA submits that there are three considerations that could inform this understanding: (i) the actual platform as well as the community of users of the platform; (ii) the users who “follow” the original publisher of the potentially defamatory statement; and (iii) shared interests with the person responsible for the initial publication.

The importance of swift and effective remedies in the publication of online disinformation

25. For good reason, our courts have laid down a very high bar that must be overcome before one can obtain interim relief against the publication of wrongful defamatory matter. It has done so in cases such as *Midi Television (Pty) Ltd v Director of Public Prosecutions* 2007 (5) SA 540 (SCA) and *Print Media South Africa v Minister of Home Affairs* 2012 (6) SA 443 (CC).

26. MMA is fully supportive of this approach.

27. However, the practical difficulty created is that this often means that wrongful defamatory matter – even severely damaging wrongful defamatory matter – is allowed to stand and circulate for very lengthy periods of time, while court proceedings

⁷ *Monroe v Hopkins* [2017] EWHC 433 (QB).

⁸ *Stocker* above n 5 at para 43.

regarding final relief take place. In an era of social media and disinformation, this can be incredibly damaging and harmful.

28. MMA is therefore of the view that courts need to adopt a robust and creative approach towards defamation proceedings and, in particular, must ensure that appropriate, effective and expeditious remedies are available in defamation proceedings relating to online publications.
29. In the context of the need for a swift and effective remedy, MMA will seek to draw on international and comparative law to expound the argument that, in the context of disinformation online, particularly where there is the reasonable likelihood of such disinformation causing harm, a multi-pronged remedy such as that followed by the court *a quo* can often be appropriate and necessary. Furthermore, MMA will seek advance arguments on the relevant consideration that the Court should take into account when determining when such an order would be appropriate, and further the measures to be considered in ensuring that any such order is both practicable and effective when dealing with content published on social media platforms.

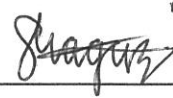
CONCLUSION

30. In the light of the submissions above, MMA requests that this Court grant MMA's application for intervention as an *amicus curiae* in the present matter.
31. MMA respectfully submits that the arguments MMA that it intends to make are relevant to this matter and will be of assistance to this Court. Accordingly, MMA reserves the right to seek costs against any party that opposes MMA's admission as an *amicus curiae*.



WILLIAM ROBERT BIRD

I hereby certify that the deponent stated that he knows and understands the contents of this affidavit and that it is to the best of his knowledge both true and correct. This affidavit was signed and sworn to before me at ROSE BANK on this the 5 day of MARCH 2020. The Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.



COMMISSIONER OF OATHS

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LCP Reg. No: F18433 | CIPC Reg. No: 2018/071686/21

Public Interest Law.

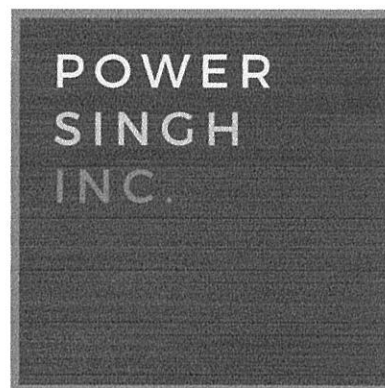
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Date: 3 March 2020

Your ref: SCA Case No. 711/19

Our ref: PSIMM-202004

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To whom it may concern,

ECONOMIC FREEDOM FIGHTERS AND OTHERS V MANUEL (CASE NO. 711/19): REQUEST FOR CONSENT TO BE ADMITTED AS AN AMICUS CURIAE

1. We act for the Media Monitoring Africa Trust ("**MMA**" or "**our client**"), a not-for-profit organisation that operates in the public interest to promote the development of a free, fair, ethical and critical media culture in South Africa and the rest of the continent. In the last

// Directors: A Singh B.Comm., LL.B. (UP), MJ Power B.A., LL.B., LL.M. (Wits) | Associate (designate): T Power B.A., LL.B., LL.M. (Wits) | Office Manager: J Rashid | Technology Officer: K Nwana. Power Singh Incorporated is a law firm registered with the Legal Practice Council (F18433) and a personal liability company registered in the Republic of South Africa (2018/071686/21).

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27 years, MMA's work has consistently related to key human rights issues, always with the objective of promoting human rights and democracy.

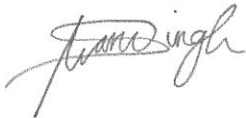
2. MMA has engaged in a range of legislative and advocacy processes relating to the triad of information rights, which include the rights to privacy, freedom of expression and access to information. This has included, for instance, on issues pertaining to data protection, online content regulation, cybercrimes, copyright, public broadcasting, and various other matters relevant to the exercise of these rights, both on- and offline.
3. MMA has further participated in various litigious proceedings pertaining to the right to freedom of expression, and the appropriate balance to be struck between freedom of expression and other competing rights and interests. This has included, for instance, participating as an applicant before the Constitutional Court in the matter of *Centre for Child Law and Others v Media 24 Limited and Others* [2019] ZACC 46, and as an *amicus curiae* before the Supreme Court of Appeal in *Van Breda v Media 24 Limited and Others; National Director of Public Prosecutions v Media 24 Limited and Others* [2017] ZASCA 97.
4. In line with MMA's particular areas of interest and the work that it pursues, MMA has a clear interest in this matter, and wishes to participate in the abovementioned appeal as an *amicus curiae* as contemplated in Rule 16 of the Rules of the Supreme Court of Appeal. Accordingly, we hereby request your client's consent that our client be admitted as an *amicus curiae* with the opportunity to file an application and make written submissions, as well as to present oral argument, in the present appeal.
5. MMA does not intend to repeat any matter set forth in the argument of the other parties, and shall remain bound to the record on appeal. We emphasise that MMA seeks only to address issues that may be useful to the Supreme Court of Appeal in the determination of this matter. In doing so, MMA intends to canvass the following issues, which it submits are relevant to the proceedings and different from those of the other parties to the litigation:
 - 5.1. **First**, MMA seeks to address the appropriate balance to be struck between the right to freedom of expression, on the one hand, and the rights to dignity and reputation, on the other, with a particular focus on the relevance and impact that disinformation may have on political discourse and matters of public importance.
 - 5.2. **Second**, MMA seeks to address the findings of the court *a quo* in determining the reasonable reader, and the prospective liability for such readers who share, tweet or otherwise re-publish disinformation on social media, in the context of appropriately realising the right to freedom of expression in the digital era.
 - 5.3. **Third**, MMA seeks to address the appropriate remedy in defamation proceedings, including the elements of a swift and effective remedy, the factors to be taken into account in respect of online publications, and the particular considerations that arise when dealing with dignity and reputation.



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6. Based on the foregoing, MMA submits that these issues are relevant to the Supreme Court of Appeal in its full consideration of this matter. In making its submissions, MMA will draw on international and comparative law, and seek to offer assistance to the Supreme Court of Appeal in assessing how to deal with the pressing – and global – challenge of disinformation online, particularly when weighed against the right to freedom of expression.
7. In order to enable MMA to properly prepare its application, we request that you advise, in writing, whether your client consents to MMA's intervention as an *amicus curiae* by no later than **17h00 on Wednesday, 4 March 2020**.
8. We look forward to hearing from you.

Yours faithfully,



POWER SINGH INC.

Per: Avani Singh / Director

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Your reference

Our reference

Date

D Milo / P Dela / L Pillay / D Naidoo
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4 March 2020

Dear Madam

Economic Freedom Fighters and Others v Manuel (Case No. 711/19)

1. We act for Mr Trevor Manuel, the respondent in the above matter.
2. We refer to your letter dated 3 March 2020 ("**your letter**"). Our client hereby consents to your client's request to be admitted as *amicus curiae* in the above matter on the basis set out in your letter.

Yours faithfully

WEBBER WENTZEL

Dario Milo

Partner

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Letter sent electronically

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