

**IN THE HIGH COURT OF SOUTH AFRICA
(GAUTENG DIVISION, PRETORIA)**

CASE NO: 2026-192997

In the matter between:

THE UNIVERSITY OF SOUTH AFRICA

Applicant

and

EDNEWS.AFRICA

First Respondent

PRAGASEN EDWIN NAIDU

Second Respondent

INDEPENDENT ONLINE

Third Respondent

MEDIA MONITORING AFRICA

Amicus Curiae

AMENDED NOTICE OF MOTION

BE PLEASED TO TAKE NOTICE THAT the Applicant intends to make application to the above Honourable Court on a date to be allocated by the Deputy Judge President, or so soon thereafter as counsel may be heard, for an order in the following terms:

1. Declaring that the articles published by the First and Second Respondents on the ednews.africa website titled "Deaths, Burnout and Academic Collapse: The Crisis

Unfolding at Unisa” and “BLOCKED! But not silenced by UNISA” bear, and are understood by the ordinary reasonable reader to bear, the meanings that:

- 1.1. the Applicant caused, or is responsible for, the deaths and hospitalisation of its staff members; and
 - 1.2. the Applicant blocked access to the ednews.africa website in order to suppress reporting of, or to conceal its responsibility for, those deaths that is, that the Applicant censored the media to cover up wrongdoing.
2. Interdicting and restraining the First and Second Respondents from publishing or republishing, in any medium, of and concerning the Applicant, any statement bearing the meanings set out in paragraphs 1.1 and 1.2 above.
3. Directing the First and Second Respondents, within 10 (ten) days of the grant of this order, to remove the following statements from the said articles, and from every other platform under their control or influence:
 - 3.1. “Three staff members, including two academics, died during June 2026. They say many of the cases are linked to stress and exhaustion following the university’s decision last year not to renew contracts for markers and e-tutors.”; and
 - 3.2. “Academics and staff at Unisa have been barred from accessing the site while on the Unisa WI-FI amid allegations that the site was blocked after weekend reports on the deaths of three staff members who according to families succumbed to illness after their heavy workloads increased when the university scrapped the roles of 5000 markers.”
4. Directing the First and Second Respondents, within 10 (ten) days of the grant of this order, to publish on the ednews.africa website, with the same or similar

prominence as the said articles, a retraction of the meanings set out in paragraphs 1.1 and 1.2 above together with a notice recording the terms of this order, in a form to be approved by this Honourable Court, alternatively by the Registrar.

5. Directing the First and Second Respondents, jointly and severally, the one paying the other to be absolved, to pay the costs of this application on the party and party scale, such costs to include the costs of senior and junior counsel.

6. Further and/or alternative relief.

TAKE NOTICE FURTHER THAT the Applicant seeks no further relief against the Third Respondent, which has removed the article republished by it on 27 July 2026, and that the order issued by this honourable court between the Applicant and Third Respondent on 19 August 2026 stands. No costs order is sought against the Third Respondent.

TAKE NOTICE FURTHER THAT the founding affidavit of **TSHATSHARA LUCAS MABUSELA**, delivered on 12 August 2026, together with the annexures thereto and the supplementary founding affidavit delivered herewith, will be used in support of this application.

TAKE NOTICE FURTHER THAT the Applicant has appointed SM Vakalisa Attorneys Inc., at the address set out below, as the address at which it will accept service of all process in these proceedings.

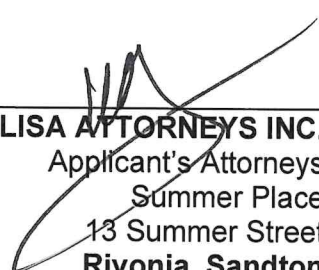
TAKE NOTICE FURTHER THAT the First and Second Respondents have delivered a notice of intention to oppose and an answering affidavit, and that, insofar as either wishes to supplement its answering affidavit in consequence of this amendment:

- a) any supplementary answering affidavit is to be delivered within 15 (fifteen) days of service of this amended notice of motion; and

b) any supplementary replying affidavit is to be delivered within 10 (ten) days of receipt thereof,

failing which the Applicant will apply for the allocation of a hearing date on the papers as they stand.

DATED at **SANDTON** on this the 28 day of September, 2026.


SM VAKALISA ATTORNEYS INC.

Applicant's Attorneys
Summer Place
13 Summer Street
Rivonia, Sandton

Tel: 010 054 6971 |

Email: smvakalisa@smvakalisa-inc.co.za

dumisani@smvakalisa-inc.co.za

thato@smvakalisa-inc.co.za

Ref: SMV/UNISA/

**TO: THE REGISTRAR OF THE ABOVE
HONOURABLE COURT PRETORIA**

AND TO: POWER & ASSOCIATES INC. t/a POWER LAW AFRICA

Attorneys for the First and Second Respondents

20 Baker Street, Rosebank, Johannesburg

Email: tina.power@powerlaw.africa;

michael.power@powerlaw.africa;

sophie.smit@powerlaw.africa;

legal@powerlaw.africa

Ref: PLEN-202614

AND TO: BOWMAN GILFILLAN INC.

Attorneys for the Amicus Curiae

11 Alice Lane, Sandton

Email: vanessa.jacklin-levin@bowmanslaw.com;

rachel.potter@bowmanslaw.com;

kabelo.ramarumo@bowmanslaw.com;
musa.makhusha@bowmanslaw.com

AND TO: INDEPENDENT ONLINE
Third Respondent
Second Floor, Silo 5, Victoria and Alfred Waterfront, Cape Town
Email: info@iol.co.za