
AFFIDAVIT

I, the undersigned,

TOHLANG PAULOSI MAKO

do hereby make oath and say :

1. I am an adult former gold mineworker residing at Mophale's Hoek, Lesotho.
2. I worked underground in the following mines in the following positions during the dates set forth below:

(1) Mine	(2) Dates	(3) Title/Position
Hartebeesfontein Mine	1982 – 2003	Sweeper Timber Boy Miner Assistant

3. I attach hereto marked "TPM1" a copy of my record of service, as captured by TEBA Limited.
4. As a sweeper, my duty was to clean the worksites underground. As a timber boy, my duty was to erect wooden poles to support the walls of the tunnels where blasting took place, to prevent them from collapsing. As a miner assistant, I was responsible for inserting the dynamite into the holes that had been drilled into the

J - TPM

tunnel walls and for spraying the rock with water after a blast to help reduce the dust created by the blast.

5. During my time working for these mining companies, I was frequently and regularly exposed to silica dust released during day-to-day mining activities. This exposure occurred from working with and near activities such as blasting, crushing and transporting rock and ore.

6. On a daily basis, I and my co-workers breathed silica dust in the following areas of the mines: in the tunnels where the blasting took place, as well as in the tunnels we walked through to get to work underground. There was a system of compressors which would blow air into the tunnels underground for purposes of cooling the worksites, but it would only add to the existing high levels of dust underground, to which we were continuously exposed.

7. My former employer provided us with respiratory masks to use, but they were not provided regularly. Further, we had to purchase our own masks, and I struggled to afford to do so, as I used my salary to support my family in Lesotho.

8. I could see taste and smell dust while I worked underground and, after each shift, my uniform was covered in dust.

T P M
J.

9. Prior to being permitted to work on the gold mines, I was medically tested for the presence of occupational lung diseases, including silicosis, and was deemed to be well and fit to work underground. Thereafter, I was examined periodically for the presence of silicosis and other occupational lung diseases.

10. In 2003 I was retrenched and I left work on the mines. I was 43 years of age. I was not aware of the rights that I have in terms of the Occupational Diseases in Mines and Works Act (ODIMWA) and the statutory compensation scheme provided for mineworkers in that Act.

11. I was diagnosed with silicosis in September 2012. I attach hereto the medical report confirming this diagnosis marked "TPM2". I did not have silicosis prior to working on the gold mines.

12. As a result of having silicosis, I am no longer able to perform any type of work to support my young daughter and my mother. Due to my ill health, I am physically weak, I suffer from shortness of breath and I am no longer able to do simple tasks without some help.

13. I have accordingly suffered the following damages:

13.1 loss of earnings;

13.2 medical expenses;

TPM
J.

13.3 general damages for pain, suffering, loss of amenities of life, disablement and reduced life expectancy.

14. I, along with thousands of other mineworkers, have contracted silicosis as a result of our employment with Respondents' mines. I am committed to vigorously prosecuting this litigation on my own and my fellow mineworkers' behalf. I intend to obtain the largest recovery for the class consistent with good faith and sound judgment.

15. I understand that if I am appointed as a class representative, I owe a duty to all members of the proposed class to provide fair and adequate representation. I will continue to work in good faith with my counsel to obtain a fair recovery for the class.

16. I will not accept any payment for serving as class representative beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages and travel costs) directly related to the representation of the class as ordered or approved by the Court.

17. The contents of this affidavit, as well as the effect of signing it, have been fully explained to me in my first language, and I understand the contents hereof.

T P M
J.

Tohlang Paulosi Mako
TOHLANG PAULOSI MAKO
Passport no. RA207345

I hereby certify that the deponent 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 MASERU on this the 10th day of DECEMBER 2012 and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

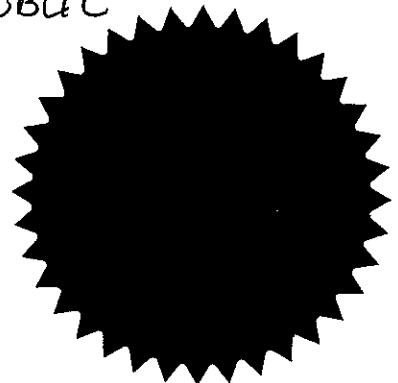
K. P. M.

COMMISSIONER OF OATHS

Full names: KOLISANG MOCHESANE LEPHOLISA

Address: 397 HILTON ROAD MASERU

Capacity: NOTARY PUBLIC



T.P.M.
J.



TEBA Limited

RSA Reg. No 1902/001680/06

HISTORY RECORD OF SERVICE

Industry No : K0873668

Date of Birth : 1960/01/04

ID Number :

Current Passport :

Issued at :

Surname : MAKO

Name(s) : TOHLANG PAULOSI

Current District - Code : 518

District Description : MOHALESHOEK

District Country : LESOTHO

Education : PRIMARY SCHOOL EDUCATION

Back History : Complete

Right Hand : AI27WW~W~IXOX

Left Hand : BI17WU~OXXX

Reg/Date	Office S/N	Year Term/Date	Comp/No	Passport	Reference Book	Client Description	Office Description	Change Date	Occupation
2003/06/05	1320	2030	2003	K0873668	RA207345	090 - HARTEBEEESTFONTEIN	MOHALESHOEK		
2002/02/27	1320	844	2002	2003/02/26	K0873668	6001010000	MOHALESHOEK		
2001/01/09	1320	221	2001	2002/01/08	K0873668	6001010000	MOHALESHOEK		
1999/10/20	1320	4509	1999	2000/10/18	K0873668	861858	MOHALESHOEK		
1999/01/06	1320	5785	1999	1999/09/30	K0873668	861858	MOHALESHOEK		
1997/08/29	1320	5216	1997	1998/07/10	043503	861858	MOHALESHOEK		
1996/08/29	1320	5522	1996	1997/08/28	043503	861858	MOHALESHOEK		
1995/08/23	1320	5621	1995	1996/08/21	043503	861858	MOHALESHOEK		
1994/06/03	1320	3881	1994	1995/05/31	043503	861858	MOHALESHOEK		
1993/01/15	1320	433	1993	1994/01/14	043508	861858	MOHALESHOEK		
1991/11/22	1320	8333	1991	1992/10/27	43508	861858	MOHALESHOEK		
1990/10/18	1320	7876	1990	1991/08/28	43508	861858	MOHALESHOEK		
1989/07/27	1320	5666	1989	1990/07/25	43508	F0108926	MOHALESHOEK		
1988/04/14	1320	2924	1988	1989/04/13	F0108926	F0108926	MOHALESHOEK		
1987/01/20	1320	720	1987	1988/01/19	43508	F0108926	MOHALESHOEK		
1985/10/17	1320	6205	1985	1986/10/14	43508	F0108926	MOHALESHOEK	1985/01/01	ASSISTANT MINER
CHANGE OF OCCUPATION									
1984/06/07	1320	3123	1984	1985/06/06	43508	F0108926	MOHALESHOEK		
1982/11/19	1320	5663	1982	1983/11/18	F0108926	F0108926	MOHALESHOEK		

"TPMI"

TPM

AFFIDAVIT

I, the undersigned,

NANABEZI MGODUSWA

do hereby make oath and say :

1. I am an adult former gold mineworker residing at Tshuzi Location, Luphilisweni Administrative Area, Bizana.

2. I worked on the following mines in the following positions during the dates set forth below:

(1) Mine	(2) Dates	(3) Title/Position
Vaal Reefs Mine	1989	Machine Operator
Hartebeesfontein Mine	1991 – 1992	Water Jet Operator
Vaal Reefs Mine (No 10 Shaft/Tau Lekoa)	1993 – 1994 1997 – 2009	Winch Driver

3. I attach hereto marked "NM1" a copy of my record of service, as captured by TEBA Limited.

NM

4. As a machine operator, I operated various machinery used in the gold mining process, including the drilling machines. As a winch driver, my duties included manually operating the winch to pull the blasted rock and ore to the tipping point. As a water jet operator, my duties included removing waste from the skip with the water jet.

5. During my time working for these mining companies, I was frequently and regularly exposed to silica dust released during day-to-day mining activities. This exposure occurred from working with and near activities such as drilling, blasting, and crushing and loading of ore and rock.

6. On a daily basis, I and my co-workers breathed silica dust in the following areas of the mines: the tunnels and stopes where blasting took place, as well as in the worksites when blasting took place on another level of the mine during a shift.

7. I could frequently see, taste and smell dust underground and, at the end of each shift, my uniform was covered in dust.

8. Prior to being permitted to work on the gold mines, I was medically tested for the presence of occupational lung diseases, including silicosis, and was deemed to be well and fit to work underground. Thereafter, I was examined periodically for the presence of silicosis and other occupational lung diseases.

9. I was retrenched in 2009, at the age of 42, as my employer found me to be medically incapacitated and no longer able to perform my duties underground. In my exit medical examination I was found to be suffering from an "occupational lung disease", but the specific disease was not indicated on the exit medical certificate (a copy of which is attached marked "NM2").

10. I was diagnosed with silicosis in July 2012. A copy of the medical report confirming this diagnosis is attached marked "NM3". I did not have silicosis prior to working on the gold mines.

11. As a result of having silicosis, I suffer from shortness of breath and I struggle to walk even short distances. I am no longer able to work to support my family and I am no longer able to partake in the activities of my community. My greatest concern is that, knowing that I have silicosis, I will need medical treatment and care which neither I, nor my family can afford.

12. I have accordingly suffered the following damages:

12.1 loss of earnings;

12.2 medical expenses;

12.3 general damages for pain, suffering, loss of amenities of life, disablement and reduced life expectancy.

13. I, along with thousands of other mineworkers, have contracted silicosis as a result of our employment with Respondents' mines. I am committed to vigorously prosecuting this litigation on my own and my fellow mineworkers' behalf. I intend to obtain the largest recovery for the class consistent with good faith and sound judgment.
14. I understand that if I am appointed as a class representative, I owe a duty to all members of the proposed class to provide fair and adequate representation. I will continue to work in good faith with my counsel to obtain a fair recovery for the class.
15. I will not accept any payment for serving as class representative beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages and travel costs) directly related to the representation of the class as ordered or approved by the Court.
16. The contents of this affidavit, as well as the effect of signing it, have been fully explained to me in my first language, and I understand the contents hereof.



NANABEZI MGODUSWA

I hereby certify that the deponent 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 BIZANA on this the 29 day of 11 2012, and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

SOUTH AFRICAN POLICE SERVICE
BIZANA
2012 -11- 29
COMMUNITY SERVICE CENTRE

Nm 20533926.
COMMISSIONER OF OATHS
Full names: NOMATHALY MADIKIZELA
Address: RIBAG X 530, BIZANA
Capacity: Cse 20533926.

NM
21/11



TEBA Limited

RSA Reg. No 1902/001680/06

HISTORY RECORD OF SERVICE

Industry No : A2804906

Date of Birth : 1967/01/16

ID Number : 6701165723088

Current Passport :

Issued at :

Surname : MGODUSWA

Name(s) : MANABEZI

Current District - Code : 035

District Description : FLAGSTAFF

District Country : SOUTH AFRICA

Education: SECONDARY LEVEL (E.G. HIGH SCH

Back History : Complete

Right Hand : M~01~U~::~~|ZXI

Left Hand : Z~01~Aa~13~SX

Reg/Date	Office S/N	Year Term/Date	Comp/No	Passport	Reference Book	Client Description	Office Description	Change Date	Occupation
2008/10/13	6150 10600	2008	BN707821	T2279682	P69	- ANGLOGOLD ASHANTI LTD	KLERKSDORP		
2007/10/29	6150 11312	2007 2008/10/13	BN707821	T2279682	P69	- ANGLOGOLD ASHANTI LTD	KLERKSDORP		
2006/10/23	6150 11192	2006 2007/09/28	BN707821	T2279682	P69	- ANGLOGOLD ASHANTI LTD	KLERKSDORP		
2005/10/12	6150 10485	2005 2006/09/21	BN707821	T2279682	P69	- ANGLOGOLD ASHANTI LTD	KLERKSDORP		
2004/11/01	6150 8617	2004 2005/10/12	BN707821	T2279682	P69	- ANGLOGOLD ASHANTI LTD	KLERKSDORP		
1997/06/05	6150 1906	1997 2004/10/31	BN707821	T2279682	200	- VAAL RIVER OPERATIONS	KLERKSDORP		
1993/07/29	6150 1854	1993 1994/12/20	0000000001	T2279682	755	- JIC MINING (PTY) LTD	KLERKSDORP		
1991/03/23	8000 3439	1991 1992/10/27		T2279682	090	- HARTEBEESTFONTEIN	CONTRACT CODE		
1989/02/15	8000 654	1989 1989/04/17	945962	T2279682	200	- VAAL RIVER OPERATIONS	CONTRACT CODE		

" NMI "

NMI

AFFIDAVIT

I, the undersigned,

THULENKHO KUSWANA

do hereby make oath and say :

1. I am an adult former gold mineworker residing at Bizana.
2. I worked on the following mines in the following positions during the dates set forth below:

(1) Mine	(2) Dates	(3) Title/Position
Vaal Reefs Mine	1976 – 1979	Machine Operator
Blyvooruitzicht Mine	1979 – 2009	Winch Driver

3. I attach hereto marked "TK1" a copy of my record of service, as captured by TEBA Limited.
4. As a machine operator, I operated various machinery used in the gold mining process, including the drilling machines. As a winch driver, my duties included manually operating the winch to pull the blasted rock and ore to the tipping point.

TK

5. During my time working for these mining companies, I was frequently and regularly exposed to silica dust released during day-to-day mining activities. This exposure occurred from working with and near activities such as drilling, blasting, and crushing and loading of ore and rock.
6. On a daily basis, I and my co-workers breathed silica dust while working underground, particularly in the tunnels and stopes where blasting took place. I could often see, taste and smell dust underground and at the end of each shift, my uniform was covered in dust.
7. Prior to being permitted to work on the gold mines, I was medically tested for the presence of occupational lung diseases, including silicosis, and was deemed to be well and fit to work underground. Thereafter, I was examined periodically for the presence of silicosis and other occupational lung diseases.
8. I was retrenched by my former employer in 2009 when my employer found me to be medically incapacitated and no longer able to perform my duties underground. I was 51 years of age.
9. I was diagnosed with silicosis in September 2012. A copy of the medical report confirming this diagnosis is attached marked "TK2". I did not have silicosis prior to working on the gold mines.

T K
RM

10. As a result of having silicosis, I suffer from shortness of breath and I cough often, particularly at night when I am trying to sleep. I am no longer able to perform physical tasks as I could before as I am physically weak. My greatest concern is that, knowing that I have silicosis, I cannot afford the medical treatment and care that I need to manage my illness.

11. I have accordingly suffered the following damages:

11.1 loss of earnings;

11.2 medical expenses;

11.3 general damages for pain, suffering, loss of amenities of life, disablement and reduced life expectancy.

12. I, along with thousands of other mineworkers, have contracted silicosis as a result of our employment with Respondents' mines. I am committed to vigorously prosecuting this litigation on my own and my fellow mineworkers' behalf. I intend to obtain the largest recovery for the class consistent with good faith and sound judgment.

13. I understand that if I am appointed as a class representative, I owe a duty to all members of the proposed class to provide fair and adequate representation. I will continue to work in good faith with my counsel to obtain a fair recovery for the class.

I K
NM

14. I will not accept any payment for serving as class representative beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages and travel costs) directly related to the representation of the class as ordered or approved by the Court.
15. The contents of this affidavit, as well as the effect of signing it, have been fully explained to me in my first language, and I understand the contents hereof.

T Kuswana
THULENKO KUSWANA

I hereby certify that the deponent 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 BIZANA on this the 29 day of 11 2012, and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.



20533926
M. M. M.
COMMISSIONER OF OATHS
Full names: NOMALITALY MADIKUZELA
Address: P1BAG X 530, BIZANA
Capacity: CSC 20533926

Tk
MM



TEBA Limited

RSA Reg. No 1902/001680/06

HISTORY RECORD OF SERVICE

Industry No : C0859239

Date of Birth : 1958/07/10

ID Number : 5807105870086

Current Passport :

Issued at :

Surname : KUSWANA

Name(s) : THULENKHO

Current District - Code : 010

District Description : BIZANA

District Country : SOUTH AFRICA

Education: PRIMARY SCHOOL EDUCATION

Back History : Complete

Right Hand : O~15~WWW~IMMX

Left Hand : O~15~WWW~OOIX

Reg/Date	Office S/N	Year Term/Date	Comp/No	Passport	Reference Book	Client Description	Office Description	Change Date	Occupation
2008/07/03	3605 851	2008 2012/08/02	EB206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
2007/04/10	3605 274	2007 2008/05/28	EB206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
2005/12/28	3605 1019	2005 2007/03/02	206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
2004/09/28	3605 1042	2004 2005/11/23	Y206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
2002/04/18	3605 589	2002 2003/05/22	Y206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
2001/01/03	3605 28	2001 2002/03/12	Y206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1999/09/01	3605 1474	1999 2000/11/30	Y206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1998/07/13	3605 1547	1998 1999/07/29	Y0206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1997/05/13	3605 1314	1997 1998/07/12	Y0206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1996/03/13	3605 1028	1996 1997/05/12	Y0206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1993/10/06	3605 3751	1993 1994/11/05	EB0206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1992/07/09	3605 2788	1992 1993/07/15	X206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1991/01/24	3605 587	1991 1992/01/27	X206474	T3520839	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1989/09/14	3605 4810	1989 1990/10/01	X206474	T2314321	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1988/07/07	3605 3197	1988 1989/07/07	X206474	T2314321	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1986/12/11	3605 6161	1986 1988/03/04	X206474	T2314321	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1985/04/18	3605 2078	1985 1986/06/24	X206474	T1832899	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1983/12/07	3605 5100	1983 1984/11/13	290548	T1832899	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1982/06/17	3605 3078	1982 1983/06/16		T0764658	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1981/01/23	3605 468	1981 1982/01/22		T0082120	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1979/10/05	3605 3281	1979 1980/10/03		T0082120	5665186	005 - BLYVOORUITZICHT	GOLD BIZANA		
1978/10/25	3605 3614	1978 1979/10/04		T0082120	5665186	200 - VAAL RIVER OPERATIONS	BIZANA		
1977/11/25	3605 3568	1977 1978/10/24		T0082120	5665186	200 - VAAL RIVER OPERATIONS	BIZANA		
1977/01/24	3605 524	1977 1977/11/24		T0082120	5665186	200 - VAAL RIVER OPERATIONS	BIZANA		
1976/01/09	3605 78	1976 1977/01/07		T3520839	5665186	200 - VAAL RIVER OPERATIONS	BIZANA		

"TKI"

TK

AFFIDAVIT

I, the undersigned,

MALEBURU REGINA LEBITSA

do hereby make oath and say :

1. I am a widow and I reside at Ha-Motsoane, Naleli, Lesotho.

2. I was married to my late husband, LEKHOOANYANA ISAAC LEBITSA, on 15 September 1986 and I attach hereto a letter confirming our marriage ("**MRL1**"), together with a translation ("**MRL2**").

3. My late husband was a former gold mineworker who worked underground in the following mines during the dates set forth below:

(1) Mine	(2) Dates
St Helena Mine	1972 - 1975
Vaal Reefs Mine	1977 - 1998

4. I attach hereto marked "**MRL3**" a copy of my late husband's history of service in the gold mines as recorded by TEBA Limited.

J. MRL2

5. My late husband left work on the mines when his former employer found that he was medically incapacitated and that he was no longer able to perform his duties. In early 2005, my husband was certified to be suffering from tuberculosis and silicosis in the second degree by the Medical Bureau for Occupational Diseases (MBOD) (see the attached copy of the MBOD certificate marked "MRL4").
6. On 30 April 2010, my husband passed away. He was 55 years of age. As per the copy of the attached death certificate marked "MRL5", the cause of his death was Tuberculosis. I am advised that scientific research shows that the risk of dying from tuberculosis is three times higher in silicotic mineworkers than those without silicosis.
7. My husband supported me whilst he was working on the mine. Consequent to working on the mines, he developed silicosis and, as a result, he left work on the mines due to ill health at the age of 42, long before the normal retirement age of 65 years. When he returned home from the mines, his health deteriorated and, as he became weaker, his ability to support his family was severely undermined. The support he provided me was fully terminated when he passed away in 2010.
8. Accordingly, as a result of my late husband contracting silicosis and being retrenched prior to the normal age of retirement due to his ill health, I suffered a reduction of support when he left work on the mines. Thereafter, when he died, the support provided by him was completely terminated.

J. M.R.

9. My late husband, along with thousands of other mineworkers, had contracted silicosis as a result of their employment with Respondents' mines. I am committed to vigorously prosecuting this litigation on my deceased husband's behalf, as well as on behalf of other dependants of deceased mineworkers. I intend to obtain the largest recovery for the class consistent with good faith and sound judgment.

10. I understand that if I am appointed as a class representative, I owe a duty to all members of the proposed class to provide fair and adequate representation. I will continue to work in good faith with my counsel to obtain a fair recovery for the class.

11. I will not accept any payment for serving as class representative beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages and travel costs) directly related to the representation of the class as ordered or approved by the Court.

12. The contents of this affidavit, as well as the effect of signing it, have been fully explained to me in my first language, and I understand the contents hereof.

J. MRL

Maleburu Regina Lebilla
MALEBURU REGINA LEBITSA PASSPORT NO. RA564432

I hereby certify that the deponent 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 MASERU on this the 07th day of DECEMBER 2019 and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

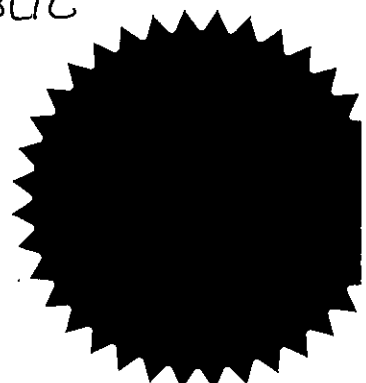
K. Mochesane

COMMISSIONER OF OATHS

Full names: KOLISANG MOCHESANE LEPHOLISA

Address: 397 HILTON ROAD MASERU

Capacity: NOTARY PUBLIC



J.M.R.L

"MRLI"

'Mate Ha Morena
Ha lejoetsoe

15-9-86

Hona ke litumellano tsa Sephula letuka le
'Mafatima lebitša ka Mora 'Mafatima
lebitša. ea nyetseng. Morali o Sephula letuka
e leng Isaac lebitša. O nyetse Mantsietso
letuka, hikhomo tse matsohong a
Sephula letuka ke li khomo tse 11.

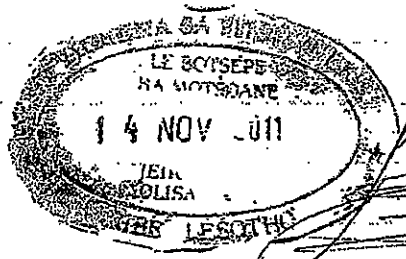
lipaki tsa Sephula letuka

- 1. Seoa Tjamane
- 2. Mohlakala Ts'o

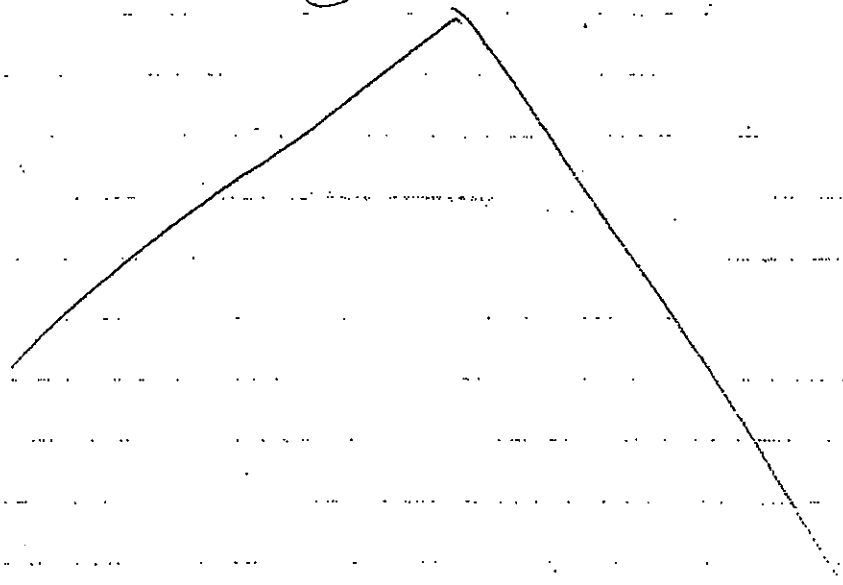
lipaki tsa Mafatima lebitša

- 1. Thabonyane lebitša
- 2. Libe Mtebe

Mongoli Koebu Phenema



Motsoane



J.M.R.L

MEMO ON LETTER DATED 15-09-1986 "NRL2"

LETTER INDICATES THAT MARRIAGE AGREEMENT
WAS CONCLUDED ~~BETWEEN~~ BETWEEN MANTSIETSO
LETUKA NOKI MALEBURU KEBITSA AND
KEHOANYANA KEBITSA

Frankie
MTEBALENG.

J. M.R.L



TEB A Limited

RSA Reg. No 1902/001680/06

HISTORY RECORD OF SERVICE

Industry No : K0691175

Date of Birth : 1955/06/30

ID Number :

Current Passport : Q002012

Issued at : LESOTHO

Surname : LEBITSA

Name(s) : LEKHOOANYANA ISAAC

Current District - Code : 506

District Description : BUTHA BUTHE

District Country : LESOTHO

Education: CERTIFICATE

Back History : Complete

Right Hand : S~01-U~XXXX

Left Hand : S~01-U~MOXX

Reg/Date	Office S/N	Year Term/Date	Comp/No	Passport	Reference Book	Client Description	Office Description	Change Date	Occupation
2003/11/28	1304 3984	2003	K0691175	Q002012	F78 - PROFESSIONAL LABOUR	F78 - PROFESSIONAL LABOUR	BUTHA BUTHE		
1997/02/18	1304 1270	1997 1998/01/15	BA576964	K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1996/05/13	1304 3098	1996 1997/02/17	BA576964	K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1994/09/22	1304 6097	1994 1995/09/21	BA576964	K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1993/08/20	1304 5071	1993 1994/08/19	BA576964	K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1992/07/30	1304 4975	1992 1993/07/29	BA576964	K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1991/07/03	1304 4418	1991 1992/07/01		K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1989/05/04	1304 3072	1989 1990/05/03		K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1988/05/27	1304 3674	1988 1989/04/19		K0098175	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1986/10/21	1304 6826	1986 1987/08/29	BA576964	F0064843	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1985/08/14	1304 4778	1985 1986/08/13		F0064843	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1984/03/02	1304 1364	1984 1985/03/01	BA576964	F0064843	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1982/03/02	1304 1235	1982 1983/03/01		E0037578	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1980/11/07	1304 5038	1980 1981/11/06		E0067578	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1979/11/02	1304 5233	1979 1980/10/31		B0079474	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1978/01/24	1304 901	1978 1979/01/23		B0079474	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1977/01/13	1304 436	1977 1978/01/12		B0079474	200 - VAAL RIVER OPERATIONS	200 - VAAL RIVER OPERATIONS	BUTHA BUTHE		
1975/08/06	1304 4415	1975 1976/08/04		B0079474	175 - S.A. LAND & EXPLORATION	175 - S.A. LAND & EXPLORATION	BUTHA BUTHE		
1974/03/15	1304 1582	1974 1975/03/14		B0079474	310 - ST HELENA GOLD MINE	310 - ST HELENA GOLD MINE	BUTHA BUTHE		
1972/08/25	1304 4105	1972 1973/08/24		B0079474	310 - ST HELENA GOLD MINE	310 - ST HELENA GOLD MINE	BUTHA BUTHE		

"MRL3"

J.
M.R.L

"MRLS"

FORM N

DEATH CERTIFICATE

No. of entry B966/2011

District BUTHA-BUTHE

Surname of deceased person LEBITSA

Name of deceased person LEKHOANYANE ISAAC

Sex of deceased person MALE

Age 58 YEARS

Nationality MOSOTHO

Profession or occupation MINER

Date of death 30-April-2010

Place of death BOTHA-BOTHE HOSPITAL

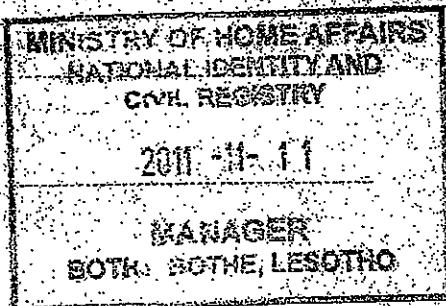
Cause of death TUBERCULOSIS

Residential address at death NALELI
LERIBE

Date Registered 11-November-2011

I hereby certify that the above certificate is a true copy of the particulars recorded in relation to the death of the above person in my register of Deaths at NATIONAL IDENTITY & CIVIL REGISTRY OFFICE, BUTHA-BUTHE.

Place



Date

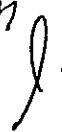
[Signature]
Registrar/District Registrar

J. M.R.

AFFIDAVIT

I, the undersigned,

~~MAATSØ~~
MATAASO MABLE MAKONE

M. M. M


do hereby make oath and say :

1. I am a widow and I reside at Butha-Buthe, Ha-Tumane, Lesotho.

2. I was married to my late husband, MOLUPE MAKONE, on 5 March 1988, and I attach hereto a letter confirming our marriage ("**MMM1**"), together with a translation, marked "**MMM2**".

3. My late husband was a former gold mineworker who worked underground in the following mines during the dates set forth below:

(1) Mine	(2) Dates
Western Holdings Mine	1974 – 1984
Free Gold (Matjhabeng)	1985 – 2007

4. I attach hereto marked "**MMM3**" a copy of my late husband's history of service in the gold mines as recorded by TEBA Limited.



5. In 2008, my late husband's former employer found that he was no longer able to perform his duties due to medical incapacity and he was retrenched. He was 52 years old. On 9 October 2003, my husband was certified to be suffering from tuberculosis and silicosis in the second degree by the Medical Bureau for Occupational Diseases (MBOD) (see the attached copy of the MBOD certificate marked "MMM4").
6. On 14 July 2011, my husband passed away. He was 55 years of age. As per the attached copy of the death certificate marked "MMM5", the cause of his death was Tuberculosis. I am advised that scientific research shows that the risk of dying from tuberculosis is three times higher in silicotic mineworkers than those without silicosis.
7. My husband supported me and our daughter, Lerato and son, Leboea, whilst he was working on the mines. Consequent to working on the mines, he developed silicosis, and, as a result, he had to leave work on the mine at the age of 52, long before he reached the normal retirement age of 65 years. Once he returned home from work on the mines, he was physically weak. As his health deteriorated, his ability to work to support his family was severely undermined. The support he provided us was fully terminated when he passed away in 2011.
8. Accordingly, as a result of my late husband contracting silicosis and being retrenched prior to the normal age of retirement due to his ill health, my children



and I suffered a reduction of support when he left work on the mines. Thereafter, when he died, the support provided by him was completely terminated.

9. My late husband, along with thousands of other mineworkers, had contracted silicosis as a result of their employment with Respondents' mines. I am committed to vigorously prosecuting this litigation on my deceased husband's behalf, as well as on behalf of other dependants of deceased mineworkers. I intend to obtain the largest recovery for the class consistent with good faith and sound judgment.

10. I understand that if I am appointed as a class representative, I owe a duty to all members of the proposed class to provide fair and adequate representation. I will continue to work in good faith with my counsel to obtain a fair recovery for the class.

11. I will not accept any payment for serving as class representative beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages and travel costs) directly related to the representation of the class as ordered or approved by the Court.

12. The contents of this affidavit, as well as the effect of signing it, have been fully explained to me in my first language, and I understand the contents hereof.

J.

M M M

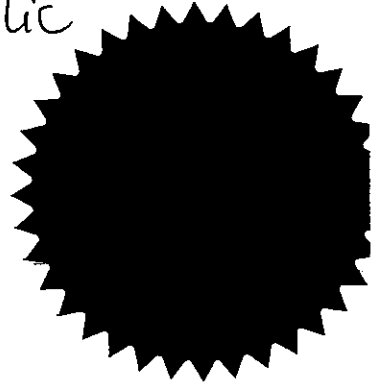
MATAASO MAKONE
MAATSO MABLE MAKONE
MATAASO

Koefolisa
PASSPORT NO. RA 565956

I hereby certify that the deponent 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 MASERU on this the 07th day of DECEMBER 2012, and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

Koefolisa

COMMISSIONER OF OATHS
Full names: KOLISANG MOCHESANE LEPHOLISA
Address: 397 HILTON ROAD MASERU
Capacity: NOTARY PUBLIC



l.

"MMMI"



Motjaeng Ha Sekhokoane
P. O. Khukhune
Botla - Botle No

05 / 03 / 1988

hona re le kiapa la ha Matiri re paka
ka tseore hore Mataaso Makone Moraai oa
Kthoesele Matiri le Mamatiri Matiri, o nyala
le Molepe Makone Mora oa Masilo Makone
le Matsepiso Makone ka selemo sa 1983 ka
kenyao la sesotho la lithomo, o utsitse lithomo
tse tsehome

lipaki tsa ha Makone

1 Makone Makone

2 Masilo Makone

3 Maapesa Khaba

lipaki tsa ha Matiri

1 Kthoesele Matiri

2 Matiri Matiri

3 Tlhalakanelo Nchee

M.M.M

"MM2"

MEMO ON LETTER DATED ^{No.} 05-08-1988

LETTER INDICATES THAT MARRIAGE
AGREEMENT WAS CONCLUDED BETWEEN
MOLUHI MATIRI NOKI MATAASO
MARONE AND MOLUPE MARONE

Jankie
MTEBOLENGA

J.
M. M. M



TEBA Limited

RSA Reg. No 1902/001680/06

HISTORY RECORD OF SERVICE

Industry No : W0345218

Date of Birth : 1964/07/10

ID Number :

Current Passport : TTD1694011

Issued at : LESOTHO

Surnams : MAKONE

Name(s) : MOLUPE

Current District - Code : 506

District Description : BUTHA BUTHE

District Country : LESOTHO

Education : PRIMARY SCHOOL EDUCATION

Back History : Complete

Right Hand : S-05-UW-0000

Left Hand : S-01-U-0000

Reg/Date	Office S/N	Year Term/Date	Comp/No	Passport	Reference Book	Client Description	Office Description	Change Date	Occupation
2007/05/07	1304 1143	2007 2007/09/21	W0345218	TTD1694011	F90 - HARMONY GOLD GROUP	F90 - HARMONY GOLD GROUP	BUTHA BUTHE		
2006/04/07	1304 969	2006 2007/05/07	W0345218	P0072195	F90 - HARMONY GOLD GROUP	F90 - HARMONY GOLD GROUP	BUTHA BUTHE		
2005/03/03	1304 600	2005 2006/04/07	W0345218	P0072195	F90 - HARMONY GOLD GROUP	F90 - HARMONY GOLD GROUP	BUTHA BUTHE		
2004/01/27	1304 295	2004 2005/01/25	BA161063	P0072195	P30 - FREE GOLD (BAMBANANI)	P30 - FREE GOLD (BAMBANANI)	BUTHA BUTHE		
2002/12/31	1304 4363	2002 2003/12/30	BA161063	P0072195	P30 - FREE GOLD (BAMBANANI)	P30 - FREE GOLD (BAMBANANI)	BUTHA BUTHE		
2001/12/21	1304 4092	2001 2002/12/20	BA161063	P0072195	P30 - FREE GOLD (BAMBANANI)	P30 - FREE GOLD (BAMBANANI)	BUTHA BUTHE		
2000/11/30	1304 4004	2000 2001/11/29	BA161063	P0072195	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1998/09/07	1304 3916	1998 1999/09/06	BA161063	P0072195	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1997/08/13	1304 4603	1997 1998/08/12	BA161063	P0072195	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1996/08/13	1304 4952	1996 1997/08/12	BA161063	P0072195	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1994/06/18	1304 5315	1994 1995/06/17	BA161063	P0072195	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1993/08/18	1304 5132	1993 1994/06/17	BA161063	K0041059	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1992/09/03	1304 5797	1992 1993/08/03	BA161063	K0041059	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1991/07/25	1304 4935	1991 1992/07/23		K0041059	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1989/04/11	1304 2537	1989 1990/04/10		K0041059	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1988/02/11	1304 1034	1988 1989/02/09		K0041059	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1987/09/17	1304 6492	1987 1988/01/27		F0066407	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1987/03/30	1304 2265	1987 1987/08/29	BA161063	F0066407	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1986/01/24	1304 591	1986 1987/01/23		F0066407	325 - FREE GOLD (MATJHABENG)	325 - FREE GOLD (MATJHABENG)	BUTHA BUTHE		
1985/07/10	1304 4067	1985 1986/01/09		F0066407	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		
1983/06/20	1304 2934	1983 1984/06/18		F0066407	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		
1981/12/18	1304 6285	1981 1982/12/17		B0185393	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		
1979/08/20	1304 3916	1979 1980/08/18		B0185393	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		
1978/02/08	1304 1247	1978 1979/02/07		B0185393	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		
1976/01/09	1304 238	1976 1977/01/07		B0185393	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		
1974/03/30	1304 1930	1974 1975/03/29		B0185393	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		
1974/01/05	1304 76	1974 1974/03/23		B0185393	320 - WESTERN HOLDINGS	320 - WESTERN HOLDINGS	BUTHA BUTHE		

"MM3"

"MM5"

DEATH CERTIFICATE

FORM N

No. of entry B660/2011

District BUTHA-BUTHE

Surname of deceased person MAKONE

Name of deceased person MOLUPE

Sex of deceased person MALE

Age 55 YEARS

Nationality MOSOTHÓ

Profession or occupation MINER

Date of death 14 July 2011

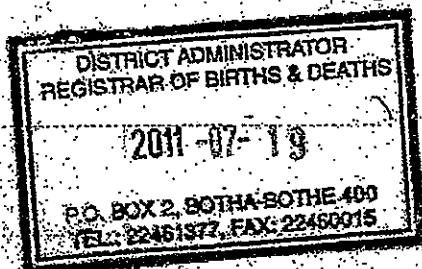
Place of death NGOAJANE HA TUMANE

Cause of death T B

Residential address at death NGOAJANE
HA TUMANE


Date Registered 19 July 2011

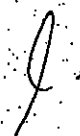
I hereby certify that the above certificate is a true copy of the particulars recorded in relation to the death of the above person in my register of Deaths at D.A. OFFICE, BUTHA-BUTHE.



Place

Date


Registrar/District Registrar



AFFIDAVIT

I, the undersigned,

MATSEKELO CISILIA MASUPHA

do hereby make oath and say :

1. I am a widow and I reside at Thuathe Phutha-Lichaba, Ha Thuntsane, Lesotho.

2. I was married to my late husband, MOKONYANA ROBERT MASUPHA, during Spring 1979 and I attach hereto a letter from the ^{Family M.C.M} Chief confirming that I was married to my late husband marked "MCM1" and a translation of the letter marked "MCM2".

3. My late husband was a former gold mineworker who worked underground in the following mines during the dates set forth below:

(1) Mine	(2) Dates
President Brand Mine	1983 – 2003

4. I attach hereto marked "MCM3" a copy of my late husband's history of service in the gold mines as recorded by TEBA Limited.

J. M.C.M

5. In March 2002, my husband was certified to be suffering from tuberculosis and silicosis in the second degree by the Medical Bureau for Occupational Diseases (MBOD) (see the attached copy of the MBOD certificate marked "MCM4"). As a result of his illness, my late husband left work on the mines in 2003, at the age of 46.

6. On 23 October 2008, my husband passed away. As per the attached death certificate marked "MCM5", the cause of his death was PTB (Pulmonary Tuberculosis). I am advised that scientific research shows that the risk of dying from tuberculosis is three times higher in silicotic mineworkers than those without silicosis.

7. My husband supported me whilst he was working on the mine. Consequent to working on the mines, he developed silicosis and, as a result, he had to leave work on the mine at the age of ⁴⁶~~45~~, long before he reached the normal retirement age of 65 years. Once he returned home from work on the mines, he was physically weak and, as his health deteriorated, his ability to support his family was severely undermined. The support he provided me and our daughter, Nkareng, was fully terminated when he passed away in 2008. M.C.M. J.

8. Accordingly, as a result of my husband contracting silicosis and being retrenched prior to the normal age of retirement due to his ill health, my daughter and I

J. M.C.M.

suffered a reduction of support when he left work on the mines. Thereafter, when he died, the support provided by him was completely terminated.

9. My late husband, along with thousands of other mineworkers, had contracted silicosis as a result of their employment with Respondents' mines. I am committed to vigorously prosecuting this litigation on my deceased husband's behalf, as well as on behalf of other dependants of deceased mineworkers. I intend to obtain the largest recovery for the class consistent with good faith and sound judgment.

10. I understand that if I am appointed as a class representative, I owe a duty to all members of the proposed class to provide fair and adequate representation. I will continue to work in good faith with my counsel to obtain a fair recovery for the class.

11. I will not accept any payment for serving as class representative beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages and travel costs) directly related to the representation of the class as ordered or approved by the Court.

12. The contents of this affidavit, as well as the effect of signing it, have been fully explained to me in my first language, and I understand the contents hereof.

J.
M.C.M

Matsekelo Cecilia Masupha

MATSEKELO CISILIA MASUPHA

PASSPORT NO. RA 246568

I hereby certify that the deponent 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 MASERU on this the 07th day of DECEMBER 2012 and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

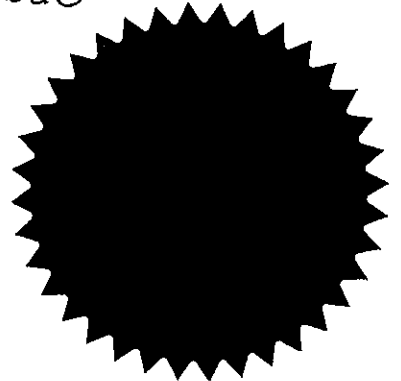
K. Mochesane

COMMISSIONER OF OATHS

Full names: KOLISANG MOCHESANE LEPHOLISA

Address: 397 HILTON ROAD MASERU

Capacity: NOTARY PUBLIC



J.
N.C.M.

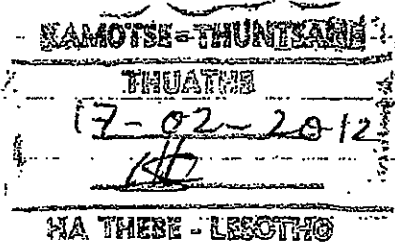
"MCM"

Thuatse Ha Thebe
P.O. Box 184
Lesotho

Mookameli

Re le lalapa la Masupha re paka boxe
matsekelo Masupha ke Mofumahali oa
Mofu ntate Mokonyana Masupha, ea
Sebelitseng Merafong, Haremore RSA.

1. Mpho Masupha
2. Majusili Masupha
3. Matikae Masupha



Executrix

J
M.C.M

"MCM 2"

27-NOV-2012 13:59 From:

To: 22265011

Page: 1/1

MEMO ON LETTER DATED 17-02-2012

LETTER INDICATES THAT THE MASUPHA FAMILY
TESTIFIES THAT MATSEKERO MASUPHA IS THE
LAWFUL WIFE OF THE LATE MOKOHYANA
MASUPHA WHO WORKED AT HARMONY MINE IN RSA

J.

M.C.M



TEBA Limited

RSA Reg. No 1902/001680/06

HISTORY RECORD OF SERVICE

Industry No : W0441494
Date of Birth : 1959/10/10
ID Number :
Current Passport : RA012628
Issued at : LESOTHO

Surname : MASUPHA
Name(s) : MOKONYANA ROBERT
Current District - Code : 503
District Description : TEYATEYANENG
District Country : LESOTHO

Education: PRIMARY SCHOOL EDUCATION
Back History : Complete
Right Hand : O~01~U~MIMI
Left Hand : M~01~U~ZIIZ

Reg/Date	Office S/N	Year Term/Date	Comp/No	Passport	Reference Book	Client Description	Office Description	Change Date Occupation
2003/04/22	1316	5146 2003	2003/05/23 736570	RA012628		280 - HARMONY	MASERU	
2002/01/28	1316	1443 2002	2003/01/21 736570	RA012628		280 - HARMONY	MASERU	
2000/09/27	1316	11484 2000	2001/09/26 B736570	RA012628		280 - HARMONY	MASERU	
1999/07/12	1316	7968 1999	2000/07/10 B736570	RA012628		280 - HARMONY	MASERU	
1988/04/29	1316	6143 1988	1999/04/28 U736163	K0061751		280 - HARMONY	MASERU	
1987/02/06	1316	3113 1987	1998/02/05 U736163	K0061751		280 - HARMONY	MASERU	
1991/06/19	1316	11346 1991	1992/06/02 T215295	K0061751		280 - HARMONY	MASERU	
1990/05/08	1316	9614 1990	1991/05/07 00215295	K0061751		280 - HARMONY	MASERU	
1989/02/09	1316	3016 1989	1990/02/08	K0061751		280 - HARMONY	MASERU	
1988/01/22	1316	1405 1988	1989/01/20	H0061751		280 - HARMONY	MASERU	
1986/11/20	1316	18081 1986	1987/11/19	G0112480		280 - HARMONY	MASERU	
1985/10/03	1316	13992 1985	1986/10/02	G0112480		280 - HARMONY	MASERU	
1983/08/10	1316	8676 1983	1984/08/08 Z215295	G0112480		280 - HARMONY	MASERU	

M.C.M

"MCM3"

"MCM5"

FORM LN

DEATH CERTIFICATE

No. of entry A5442/2008

District MASERU

Surname of deceased person MASUPHA

Name of deceased person MOKONYANA ROBERT

Sex of deceased person MALE

Age 51 YEARS

Nationality MOSOTHO

Profession or occupation NA

Date of death 23-October-2008

Place of death QUEEN II HOSPITAL

Cause of death PTB

Residential address at death SEHLABENG

Date Registered 28-October-2008

I hereby certify that the above certificate is a true copy of the particulars recorded in relation to the death of the above person in my register of Deaths at **D.A. OFFICE, MASERU**.

Place DISTRICT ADMINISTRATION
DISTRICT REGISTRAR OF

Date 2008-10-29
BIRTHS & DEATHS
MASERU, LESOTHO

J. M.C.M

[Signature]
Registrar/District Registrar

AFFIDAVIT

I, the undersigned,


MATISETSO MASEIPATI JESENTA NONG

do hereby make oath and say :

1. I am a widow and I reside at Matelile, Ha Rannakoe, Lesotho.
2. I was married to my late husband, SAMUEL LEPONESA NONG, on 8 March 1980 and I attach hereto a copy of our marriage certificate marked "**MMJN1**".
3. My late husband was a former gold mineworker who worked underground in the following mines during the dates set forth below:

(1) Mine	(2) Dates
President Steyn Mine	1984 – 1998
Free Gold (Bambanani) Mine	1998 – 2005

4. I attach hereto marked "**MMJN2**" a copy of my late husband's history of service in the gold mines as recorded by TEBA Limited.


M. M. J. N

5. In October 2003, my husband was certified to be suffering from tuberculosis and silicosis in the second degree by the Medical Bureau for Occupational Diseases (MBOD) (see the attached copy of the MBOD certificate marked "MMJN3"). As a result of his illness, my late husband left work on the mines in 2005, at the age of 48.
6. On 11 February 2007, my husband passed away. As per the attached death certificate marked "MMJN4", the cause of his death was TB (Tuberculosis). I am advised that scientific research shows that the risk of dying from tuberculosis is three times higher in silicotic mineworkers than those without silicosis.
7. My husband supported me whilst he was working on the mine. Consequent to working on the mines, he developed silicosis and, as a result, he had to leave work on the mine at the age of 48, long before he reached the normal retirement age of 65 years. Once he returned home from work on the mines, and his health deteriorated, he grew weaker, and his ability to support his family was severely undermined. The support he provided me was fully terminated when he passed away in 2007.
8. Accordingly, as a result of my husband contracting silicosis and being retrenched prior to the normal age of retirement due to his ill health, I suffered a reduction of support when he left work on the mines. Thereafter, when he died, the support provided by him was completely terminated.


M.M.J.N

9. My late husband, along with thousands of other mineworkers, had contracted silicosis as a result of their employment with Respondents' mines. I am committed to vigorously prosecuting this litigation on my deceased husband's behalf, as well as on behalf of other dependants of deceased mineworkers. I intend to obtain the largest recovery for the class consistent with good faith and sound judgment.
10. I understand that if I am appointed as a class representative, I owe a duty to all members of the proposed class to provide fair and adequate representation. I will continue to work in good faith with my counsel to obtain a fair recovery for the class.
11. I will not accept any payment for serving as class representative beyond my pro rata share of any recovery, except such reasonable costs and expenses (including lost wages and travel costs) directly related to the representation of the class as ordered or approved by the Court.
12. The contents of this affidavit, as well as the effect of signing it, have been fully explained to me in my first language, and I understand the contents hereof.

Matiisetso M. J. Nong
MATISETSO MASEIPATI JESENTA NONG

Passport no. RA 474613

J. M. M. J. N

I hereby certify that the deponent 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 MASERU on this the 07 day of DECEMBER 2012 and that the Regulations contained in Government Notice R.1258 of 21 July 1972, as amended, have been complied with.

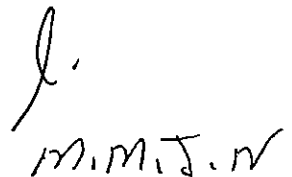
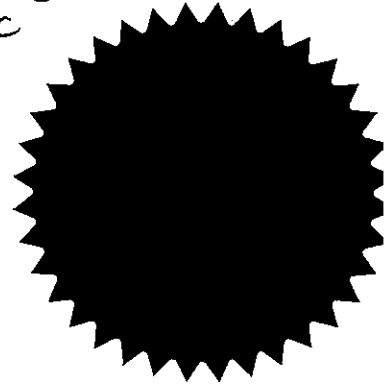


COMMISSIONER OF OATHS

Full names: Kolisang Mochesane Lepholsa

Address: 397 HILTON ROAD MASERU

Capacity: NOTARY PUBLIC



M.M.T.N

LESOTHO MARRIAGE CERTIFICATE

(Issued in terms of Section 4 of Proclamation No. 7 of 1911)

CHRISTIAN Marriage solemnized at M. MOKHOTLAHLE in the Parish of ESHA MOKHOTLAHLE District of M. MOKHOTLAHLE on the 8th day of NOVEMBER

No.	When Married	Names and Surnames	Ages	Condition	Rank or Profession	Residence at the time of Marriage	After Banns or Licence	Consent by whom Judges or
	$\frac{24}{80}$	LEPOLESIA MONG	27	Bachelor	miner	Ate Ramabese	Banns	Therese
	$\frac{24}{80}$	JANE MOKHOTLAHLE	22	Spinster	Housewife	At Ramabese	Banns	Parents

Married in Roman Catholic Church at Mokhotlahle aforesaid by me V. K. ISOEBANE MARRIAGE
 This marriage was solemnized between us Leponosa Nona Leponosa Nona in the presence of Leponosa Nona Leponosa Nona

I V. K. ISOEBANE do hereby certify that the above is a true copy of the Original Marriage Register kept in my Office of Leponosa Nona and Leponosa Nona Given under my hand at Mokhotlahle this 8th day of NOVEMBER 19 80

CHAUS MISHAN
 P.O. MOKHOTLAHLE
 MARRIAGE LESOTHO
 (Signature) V. K. ISOEBANE
 (Designation) MARRIAGE





T E B A Limited

RSA Reg. No 1902/001600/06

HISTORY RECORD OF SERVICE

Date: 05/08/31

COPY

Industry No : W0994717

Date of Birth : 1954/01/01

ID Number :

Current Passport : 1327257

Issued at : LESOTHO

Surname : NONG

Name(s) : LEPONESA SAMUEL

Current District - Code : 512

District Description : MAFETENG

District Country : LESOTHO

Education: PRIMARY SCHOOL EDUCATION

Back History : Not Complete

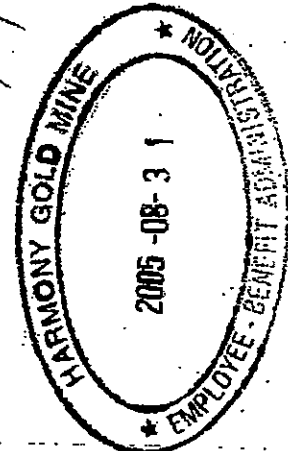
Right Hand :

Left Hand :

Reg/Date	Office S/N	Year	Term/Date	Comp/No	Passport	Client Description	Office Description
2005/08/08	1312 4521	2005		AW0994717	1327257	F90 - HARMONY GOLD GROUP	MAFETENG
2004/06/24	1312 4341	2004	2005/06/23	BA446475	K0192039	F90 - HARMONY GOLD GROUP	MAFETENG
2003/05/08	1312 3111	2003	2004/05/08	BA446475	N0288429	P30 - FREE GOLD (BAMBANANI)	MAFETENG
2002/04/08	1312 2563	2002		ABA446475	N0288429	P30 - FREE GOLD (BAMBANANI)	MAFETENG
2001/03/06	1312 1567	2001	2002/03/06	BA446475	N0288429	P30 - FREE GOLD (BAMBANANI)	MAFETENG
2000/03/20	1312 2011	2000	2001/03/05	BA446475	N0288429	P30 - FREE GOLD (BAMBANANI)	MAFETENG
1999/03/15	1312 1617	1999	2000/03/13	BA446475	N0288429	P30 - FREE GOLD (BAMBANANI)	MAFETENG
1998/02/24	1312 1922	1998	1999/02/23	BA446475	N0288429	P30 - FREE GOLD (BAMBANANI)	MAFETENG
1997/02/12	1312 2048	1997	1998/02/11	BA446475	N0288429	P30 - FREE GOLD (BAMBANANI)	MAFETENG
1996/07/02	1312 6201	1996	1997/02/11	BA446475	N0288429	305 - PRESIDENT STEYN MINE	MAFETENG
1996/01/10	1312 846	1996	1996/07/01	BA446475	N0288429	305 - PRESIDENT STEYN MINE	MAFETENG
1994/12/07	1312 12606	1994	1995/12/06	BA446475	H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1993/10/18	1312 10309	1993	1994/10/17	BA446475	H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1992/09/24	1312 10052	1992	1993/09/23	BA446475	H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1991/08/16	1312 8642	1991	1992/08/14		H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1989/04/25	1312 5014	1989	1990/04/24		H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1988/02/25	1312 2572	1988	1989/02/23		H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1987/01/02	1312 206	1987	1988/01/01		H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1986/05/29	1312 5315	1986	1986/12/18		H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1984/12/21	1312 10164	1984	1985/12/20		H0038029	305 - PRESIDENT STEYN MINE	MAFETENG
1984/02/23	1312 1889	1984	1984/09/25		H0038029	305 - PRESIDENT STEYN MINE	MAFETENG

6874

M.M.J.N



23
"MMJN4"

DEATH CERTIFICATE

FORM N

No. of entry E461/2007

District MAFETENG

Surname of deceased person NONG

Name of deceased person LEPONESA SAMUEL

Sex of deceased person MALE

Age 51 YEARS

Nationality MOSOTHO

Profession or occupation NINER

Date of death 11-February-2007

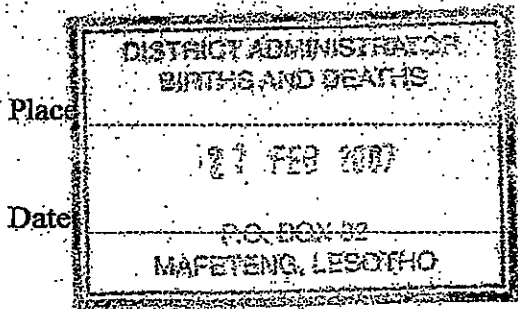
Place of death GOVERNMENT HOSPITAL

Cause of death TB

Residential address at death THABA TSOEU

Date Registered 21-February-2007

I hereby certify that the above certificate is a true copy of the particulars recorded in relation to the death of the above person in my register of Deaths at **D.A. OFFICE, MAFETENG**



[Signature]
Registrar/District Registrar

[Signature]
M.M.J.N