

IN THE SUPREME COURT OF SOUTH AFRICA.

(CAPE OF GOOD HOPE PROVINCIAL DIVISION.)

In the matter of:

THE STATE

versus

1. EDWARD JOSEPH DANIELS.
2. DAVID GUY DE KELLER.
3. ANTONY ANDREW TREW.
4. ALAN BROOKS.
5. STEPHANIE KEMP.

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REQUEST FOR FURTHER PARTICULARS  
TO THE INDICTMENT ON BEHALF  
OF ACCUSED NO. 3.

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A. Ad the Main Charge.

1. (a) Full particulars are required of the manner in which Accused No. 3 is alleged to have joined the conspiracy.
- (b) When is Accused No. 3 alleged to have joined the conspiracy?
- (c) Alternatively, if the State is unable to give the said date, it is required to state before what date it is alleged that he had joined the conspiracy.
2. (a) Is it alleged that Accused No. 3 considered  
or/....

or planned any of the acts referred to in paragraph 3 of the Schedule?

- (b) If so, particulars are required of the time when and place where he is alleged to have done so.
3. (a) Is it alleged that Accused No. 3 possessed any of the explosives referred to in paragraph 5 of the Schedule?
- (b) If so particulars are required of the said explosives, and of the time and place of the alleged possession.
  - (c) The names are required of the other persons alleged to have been in possession of the said explosives, with particulars of the time and place of the alleged possession.
4. (a) Is it alleged that Accused No. 3 prepared time bombs or shape charges?
- (b) If so, full particulars are required, including relevant particulars of time and place.
5. (a) Is it alleged that Accused No. 3 organised or was a member of any cell?
- (b) Is so, particulars are required of the membership of such cell, at all relevant times, and of the acts or activities re-referred to in the indictment which the said cell is alleged to have carried out.

Particulars are further required of Accused No. 3's alleged activities in connection with the said cell and his date of joining and period of membership.

B./....

B. Ad the Alternative Charge.

1. (a) When or alternatively by what date is it alleged Accused No. 3 became or remained a member or an active supporter of the said organisation?
- (b) In what manner is it alleged that he became or remained a member or an active supporter?
2. Particulars are required of the facts upon which the State relies in support of its allegations concerning the aims and objects of the said organisation, including copies of any relevant documents.

DATED at CAPE TOWN, this 22nd DAY of OCTOBER 1964.

MacCALLUM S.

per: **R. D. PILKINGTON JORDAN**

Attorneys for Accused No. 3.  
85, St. George's Street,  
CAPE TOWN.

TO: The Registrar,  
The Supreme Court of South Africa,  
(Cape of Good Hope Provincial Division),  
CAPE TOWN.

AND TO: The Attorney General for the Province  
of the Cape of Good Hope,  
Supreme Court Chambers,  
CAPE TOWN.