

WEBBER WENTZEL

in alliance with > **Linklaters**

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Your reference	Our reference	Date
	D Milo / N Farrell / K Petersen 4006411	4 March 2024

Dear Sirs

Request for access to information in terms of section 53(1) of the Promotion of Access to Information Act of 2000 ("PAIA")

1. We act for Campaign for Free Expression NPC. We refer to your letter, sent on behalf of your client ("**Google**"), dated 29 February 2024.
2. Our client requests access to the records listed in Annexure "**A**" to this letter. Our client's request, in the prescribed form, is attached marked Annexure "**B**".
3. Our client brings this request in both its own interest and in the public interest. Access to the requested records is crucial to the exercise and protection of our client's rights, namely:
 - 3.1 Our client's right to meaningfully participate in the ongoing Media and Digital Platforms Market Inquiry ("**Inquiry**") initiated by the Competition Commission; and
 - 3.2 Our client's right to media freedom is entrenched in section 16 of the Constitution of the Republic of South Africa, 1996. The impact of the South African digital markets and the distorted market features present therein, in which Google plays a dominant role, on South Africans' access to a competitive and free press is well documented. Google's dominance in digital markets severely affects news publishers' commercial viability and directly impedes their ability to publish news. The requested records are crucial to ensuring that the right to media freedom is effectively realised not only by our client, but by all South Africans.
4. We look forward to your response as soon as possible. Given the ongoing Inquiry, our client requires access to the records requested on an urgent basis.

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Chief Operating Officer: SA Boyd

5. All our client's rights are reserved.

Yours faithfully

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Letter sent electronically.