

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

Case No: CCT 25/09

CPD Case No: 10013/07

In the *ex parte* application of:

**THE SOUTH AFRICAN HISTORY ARCHIVES
TRUST**

Applicant for admission
as *amicus curiae*

In the application for leave to appeal in the matter between:

STEFAANS CONRAD BRUMMER

Applicant

and

THE MINISTER OF SOCIAL DEVELOPMENT

First Respondent

THE DIRECTOR-GENERAL OF THE DEPARTMENT

OF SOCIAL DEVELOPMENT

Second Respondent

THE MINISTER OF JUSTICE AND

CONSTITUTIONAL DEVELOPMENT

Third Respondent

NOTICE OF MOTION

PLEASE TAKE NOTICE that the **SOUTH AFRICAN HISTORY ARCHIVES TRUST** hereby makes application to the above Honourable Court for an order in the following terms:

1. Admitting the South African History Archives Trust as *amicus curiae* in the above proceedings in terms of Rule 10(6) of the rules of this Court;
2. Granting the South African History Archives Trust:
 - 2.1. the opportunity to make written submissions in the above matter;
 - 2.2. the opportunity to present oral argument at the hearing of this matter;
3. Further or alternative relief.

TAKE NOTICE FURTHER that the affidavit of **PIERS PIGOU** will be used in support hereof.

TAKE NOTICE FURTHER that the South African History Archives Trust has appointed the offices stated below as the address at which they will accept notice and service of all documents in these proceedings.

Kindly place this matter before the Chief Justice to be dealt with in terms of Rule 10 of the Rules of this Court.

Dated at Johannesburg on this 19 May 2009.

ROSIN WRIGHT ROSENGARTEN
Attorneys for the South African History Archives
Trust
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Forest Town
Johannesburg
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TO: THE REGISTRAR, CONSTITUTIONAL COURT

**AND TO: THE APPLICANTS
THE OPEN DEMOCRACY ADVICE CENTRE:
c/o BLAKE BESTER ATTORNEYS**

191 Jan Smuts Avenue

Rosebank

Johannesburg

Tel: 011 880-4895

Attention: Lynsey Foot

Received on this the ____ day
of May 2009

_____ (Signature)

_____ (Print Name)

Duly authorised

Also by e.mail to: michelle@opendemocracy.org.za

**AND TO: THE RESPONDENTS:
C/O THE STATE ATTORNEY
Ms B. Mantame
REF: 2790/07/P17**

Service by Fax No: 021 421 9364