

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

Case Number: CCT 25/09

In the application of:

THE HUMAN RIGHTS COMMISSION OF SOUTH AFRICA Applicant for admission
as an amicus curiae

In the matter between:

STEFAANS CONRAD BRUMMER Applicant

and

THE MINISTER OF SOCIAL DEVELOPMENT First Respondent

**DIRECTOR-GENERAL OF THE DEPARTMENT
OF SOCIAL DEVELOPMENT** Second Respondent

**THE MINISTER OF JUSTICE AND
CONSTITUTIONAL DEVELOPMENT** Third Respondent

NOTICE OF MOTION

TAKE NOTICE THAT the South Africa Human Rights Commission hereby makes application to the above Honourable Court for an order:

1. That leave be granted to the South African Human Rights Commission to be admitted as *amicus curiae* in the abovementioned matter, in terms of Rule 10(6) of the Constitutional Court Rules;
2. Granting the South African Human Rights Commission the opportunity to make written submissions; and present oral argument at the hearing of the matter; and
3. Further or alternative relief.

TAKE NOTICE FURTHER that the accompanying affidavit of **THOMAS MADIKWE MANTHATA** will be used in support of this application.

TAKE NOTICE FURTHER that the applicant has appointed Webber Wentzel attorneys as the address at which it will accept notice and service of all process in these proceedings.

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

DATED at _____ this _____ day of _____ May 2009.

WEBBER WENTZEL

Attorneys for the South African Human Rights Commission
10 Fricker Road
Illovo Boulevard
Johannesburg
Ref: Dario Milo/Emma Sadleir
Tel: (011) 530-5232/ 072 901 9779
Fax: (011) 530-6232
Email: dario.milo@webberwentzel.com

TO:

**REGISTRAR
CONSTITUTIONAL COURT**
Constitutional Hill
Braamfontein
Johannesburg

AND TO:

**THE APPLICANT
THE OPEN DEMOCRATIC ADVICE CENTRE**
No 6 Spin Street
Cape Town
c/o **BLAKE BESTER ATTORNEYS**
191 Jan Smuts venue
Rosebank
Johannesburg
Tel: 011 880 4895
Ref: Lynsey Foot
Plaintiff's Attorneys

Received copy hereof on
2009

:

For: The Applicant

Also by email to: michelle@opendemocracy.org.za

AND TO:

**THE FIRST, SECOND AND THIRD RESPONDENTS
THE STATE ATTORNEY**

4th Floor
Liberty Life Centre
22 Long Street
Cape Town
Ref; Ms B Mantame

Service by fax to: 021 421 9364

AND TO:

**THE SOUTH AFRICAN HISTORY ARCHIVES TRUST
ROSIN WRIGHT ROSENGARTEN**

45 Oxford Road
Forest Town
Johannesburg
Ref: Mr M Rosin
Tel: 011 646 2190
Fax: 011 646 1706

Received copy hereof on _____
2009

For: The South African History Archives

