

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

Case No: _____

CPD Case No: 10013/07

In the matter between:

STEFAANS CONRAD BRÜMMER

Applicant

and

THE MINISTER OF SOCIAL DEVELOPMENT

First Respondent

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

Second Respondent

**THE MINISTER OF JUSTICE & CONSTITUTIONAL
DEVELOPMENT**

Third Respondent

**APPLICATION FOR LEAVE TO APPEAL DIRECTLY TO THIS COURT AND
FOR CONFIRMATION OF THE ORDER OF CONSTITUTIONAL
INVALIDITY**

TAKE NOTICE that the Applicant hereby applies to this Court for the following relief –

- (a) leave to appeal directly to this Court against paragraphs 1 and 2 of the order and judgment handed down by Zondi J on 16 March 2009 in the Western Cape High Court, Cape Town;
- (b) confirmation of paragraph 3 of the order and judgment handed down by Zondi J on 16 March 2009 in the Western Cape High Court, Cape Town;
- (c) Further and/or alternative relief;
- (d) Directing the Respondents jointly and severally to pay the Applicant's costs of suit including costs of two counsel.

TAKE NOTICE FURTHER that the accompanying affidavit of **ALISON TILLEY** will be used in support hereof.

TAKE NOTICE FURTHER that the Applicant has appointed the offices of Blake Bester Attorneys, 191 Jan Smuts Avenue, Rosebank 2121 at which he will accept notice and service of all documents.

TAKE NOTICE FURTHER that if you intend opposing this application, you are required to notify the Applicant within 10 (ten) days from the date on which this application is lodged of such intention and the grounds for such opposition, whereafter the Registrar will be requested to place this matter

before the Chief Justice to be dealt with in accordance with the Rules of this Court.

DATED at CAPE TOWN on this the day of 2009.

OPEN DEMOCRACY ADVICE CENTRE

Applicant's Attorneys

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Cape Town

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2121

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TO: THE REGISTRAR OF THE CONSTITUTIONAL COURT

Constitutional Hill

Braamfontein

JOHANNESBURG

Fax. 011 339 5098

Email. registrar@concourt.org.za

AND TO: THE FIRST, SECOND, AND THIRD RESPONDENTS

c/o State Attorney

4th Floor

Liberty Life Centre

22 Long Street

Cape Town