

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA
(REPUBLIC OF SOUTH AFRICA)

In the application of:

CASE NO: 54/11

CENTRE FOR APPLIED LEGAL STUDIES

First Applicant

**COUNCIL FOR THE ADVANCEMENT OF
THE SOUTH AFRICAN CONSTITUTION**

Second Applicant

and

**PRESIDENT OF THE
REPUBLIC OF SOUTH AFRICA**

First Respondent

**THE MINISTER OF JUSTICE AND
CONSTITUTIONAL DEVELOPMENT**

Second Respondent

CHIEF JUSTICE SANDILE NGCOBO

Third Respondent

In the application of:

CASE NO: 53/11

JUSTICE ALLIANCE OF SOUTH AFRICA

Applicant

and

**PRESIDENT OF THE
REPUBLIC OF SOUTH AFRICA**

First Respondent

**THE MINISTER OF JUSTICE AND
CONSTITUTIONAL DEVELOPMENT**

Second Respondent

CHIEF JUSTICE SANDILE NGCOBO

Third Respondent

In the application of:

CASE NO: 54/11

FREEDOM UNDER LAW

Applicant

and

**PRESIDENT OF THE
REPUBLIC OF SOUTH AFRICA**

First Respondent

**DIRECTOR-GENERAL: JUSTICE AND
CONSTITUTIONAL DEVELOPMENT**

Second Respondent

**THE MINISTER OF JUSTICE AND
CONSTITUTIONAL DEVELOPMENT**

Third Respondent

CHIEF JUSTICE SANDILE NGCOBO

Fourth Respondent

APPLICATION FOR ADMISSION AS AMICUS CURIAE

PLEASE TAKE NOTICE THAT, Black Lawyers Association (BLA) hereby makes application to the above honourable court in the above proceedings in the following terms:

1. Admitting the Applicant as amicus curiae in the above proceedings in terms of Rule 10(6) of the Constitutional Court Rules;

2. Granting the Applicant the opportunity to submit written argument in the above matter; and to present oral argument at the hearing of this matter; and
3. Further and alternative relief.

TAKE NOTICE FURTHER THAT the founding affidavit of Nano Matlala will be used in support hereof.

TAKE NOTICE FURTHER THAT the Court is requested to issue directions as to:

- (i) the filing of written submissions by BLA, should BLA be admitted as amicus curiae; and
- (ii) any further matters it may require BLA to address.

TAKE NOTICE FURTHER THAT the applicants have appointed **T.T. HLAPOLOSA ATTORNEYS INC of 148 Corlett Drive Bramley, Johannesburg** as the address at which they will accept notice and service of all process in these proceedings.

TAKE NOTICE FURTHER THAT any respondent wishing to oppose this application shall, within 5 days after the lodging of this application or such shorter period as this Court may direct, notify the applicant and the Registrar in writing of his or her intention to oppose.

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

DATED at JOHANNESBURG on this _____ day of JULY 2011

T.T. HLAPOLOSA ATTORNEYS INC
ATTORNEYS FOR BLA
148 CORLETT DRIVE
BRAMLEY
JOHANNESBURG
TEL: 011 440 1117
FAX: 086 585 9697
REF: TTH/BLA/011

TO:

THE REGISTRAR
Constitutional Court, South Africa

AND TO:

JUSTICE ALLIANCE OF SOUTH AFRICA

Applicant
Nortons Inc
135 Daisy Street
Johannesburg
(Ref Anthony Norton)
Tel 011 666 7560
Fax 086 600 5529
AND TO:

FREEDOM UNDER LAW

Applicant
Webber Wentzel
10 Fricker Road
Illovo Boulevard
Johannesburg, 2196
Tel 011 530 5232
Fax 011 530 6232

AND TO:

CENTRE FOR APPLIED LEGAL STUDIES

Applicant

Centre for Applied Legal Studies
1st floor, DJ du Plessis Building, West Campus
University of Witwatersrand
1 Jan Smuts Avenue

Johannesburg

Tel 011 717 8600

Fax 011 717 1702

AND TO:

**PRESIDENT OF THE
REPUBLIC OF SOUTH AFRICA**

First Respondent
c/o The State Attorney, Johannesburg
North State Building
Market Street
Johannesburg
Tel 011 330 7606
Fax 011 330 6200

AND TO:

**THE MINISTER OF JUSTICE AND
CONSTITUTIONAL DEVELOPMENT**

Second Respondent
c/o The State Attorney, Johannesburg
North State Building
Market Street
Johannesburg
Tel 011 330 7606
Fax 011 330 6200

AND TO:

**THE DIRECTOR-GENERAL: JUSTICE AND
CONSTITUTIONAL DEVELOPMENT**

Second Respondent
Momentum Building
329 corner of Pretorius and Prinsloo Streets
Pretoria
Tel 012 315 1645
Fax 012 322 3155

AND TO:

CHIEF JUSTICE SANDILE NGCOBO
Third Respondent
c/o Constitutional Court of South Africa
1 Hospital Street
Constitution Hill
Braamfontein
Tel 011 359 7400
Fax 0866 491 253