

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

CASE NO: 62/11

In the application of

CENTRE FOR APPLIED LEGAL STUDIES _____First Applicant

**COUNCIL FOR THE ADVANCEMENT OF
THE SOUTH AFRICA CONSTITUTION** _____Second Applicant

and

**PRESIDENT OF THE
REPUBLIC OF SOUTH AFRICA** _____First Respondent

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

CHIEF JUSTICE NGCOBO Third Respondent

In the application of:

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 NGCOBO Third Respondent

**NOTICE OF MOTION FOR APPLICATION AS AMICUS CURIAE FOR
DEMOCRATIC GOVERNANCE AND RIGHTS UNIT (DGRU)**

TAKE NOTICE that the Democratic Governance and Rights Unit (“**DGRU**”) of the
University of Cape Town hereby makes application to the above Honourable Court in
the proceedings in the following terms:-

1. Admitting the Applicant as amicus curiae in the above proceedings in terms of ~~R~~ule 10 (6) of the Constitutional Court Rules;
2. Granting the ~~A~~pplicant an opportunity to submit written argument in the above matter; and to present oral argument at the hearing of this matter;
3. Further and / or alternative relief.

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

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

TAKE NOTICE FURTHER that the Applicant has appointed BOUVERIE BURGER THERON INC, ~~3939~~ Main Avenue, Bensure Building, FERNDALE, JOHANNESBURG as the address at which they 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 **JOHANNESBURG** on this the **14th Day JULY** 2011

BOUVERIE BURGER THERON INC

Attorneys for DGRU

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Ferndale

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Email: Jeanette@bbtlaw.co.za

TO:

THE REGISTRAR

Constitutional Court of South Africa

AND TO:

JUSTICE ALLIANCE OF SOUTH AFRICA

Applicant

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Email: Anthony@nortonsinc.com

AND TO:

FREEDOM UNDER LAW

Applicant

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AND TO:

CENTRE FOR APPLIED LEGAL STUDIES

Applicant

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AND TO:

PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA

First Respondent
C/O The State Attorney, Johannesburg
North State Building
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Fax. 011- 330 6200
Email: vdhulam@justice.gov.za

AND TO:

THE MINISTER OF JUSTICE & CONSTITUTIONAL DEVELOPMENT

The Second Respondent
C/O The State Attorney, Johannesburg
North State Building
Market Street
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Fax. 011- 330 6200
Email: vdhulam@justice.gov.za

AND TO:

**DIRECTOR-GENERAL OF JUSTICE & CONSTITUTIONAL
DEVELOPMENT**

Third Respondent
C/O The State Attorney, Johannesburg
North State Building
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AND TO:

CHIEF JUSTICE SANDILE NGCOBO

Fourth Respondent
C/O Constitutional Court of South Africa
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Constitutional Hill
Braamfontein
Tel. 011- 359 7400
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AND TO:

NADEL
UMUNYANA RUGEGE
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