

**IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA
HELD AT BRAAMFONTEIN, JOHANNESBURG**

Cases CCT 66/21 and CCT 67/21

Case CCT 66/21

In the application of:

CENTRE FOR APPLIED LEGAL STUDIES

Applicant for admission as
amicus curiae

In the matter between:

MINERAL SANDS RESOURCES (PTY) LTD

First Applicant

MINERAL COMMODITIES LIMITED

Second Applicant

ZAMILE QUNYA

Third Applicant

MARK VICTOR CARUSO

Fourth Applicant

and

CHRISTINE REDDELL

First Respondent

TRACEY DAVIES

Second Respondent

DAVINE CLOETE

Third Respondent

MZAMO DLAMINI

Fourth Respondent

CORMAC CULLINAN

Fifth Respondent

JOHN GERRARD INGRAM CLARKE

Sixth Respondent

Case CCT 67/21

In the matter between:

CHRISTINE REDDELL

First Applicant

TRACEY DAVIES

Second Applicant

DAVINE CLOETE

Third Applicant

MZAMO DLAMINI	Fourth Applicant
CORMAC CULLINAN	Fifth Applicant
JOHN GERRARD INGRAM CLARKE	Sixth Applicant
and	
MINERAL SANDS RESOURCES (PTY) LTD	First Respondent
MINERAL COMMODITIES LIMITED	Second Respondent
ZAMILE QUNYA	Third Respondent
MARK VICTOR CARUSO	Fourth Respondent

**NOTICE OF APPLICATION:
APPLICATION FOR ADMISSION AS *AMICUS CURIAE***

TAKE NOTICE THAT the Centre for Applied Legal Studies (“CAL S”) hereby makes application to this Honourable Court for an order in the following terms:

- 1 Admitting CALS as an *amicus curiae* in the matter under Case Number CCT 66/21;
- 2 Granting CALS leave to submit written argument in the matter under Case Number CCT 66/21 on a date to be determined by this Honourable Court;
- 3 Granting CALS leave to make oral argument at the hearing of the matter under Case Number CCT 66/21;
- 4 Further and/or alternative relief.

TAKE FURTHER NOTICE that the founding affidavit of **PALESA ROSE MADI**, together with the annexures thereto, will be used in support of this application.

TAKE FURTHER NOTICE that CALS has appointed the offices stated below as the address at which it will accept notice and service of all process in these proceedings.

CALS will also accept electronic service at Thandeka.Kathi@wits.ac.za

and Sithuthukile.Mkhize@wits.ac.za

Dated at **JOHANNESBURG** on the 30th day of December 2021.



CENTRE FOR APPLIED LEGAL STUDIES

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Ref:T Kathi/S Mkhize

TO: THE REGISTRAR
Constitutional Court of South Africa
BRAAMFONTEIN

AND TO: R KUDO
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AND TO: WEBBER WENTZEL
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AND TO: FAIRBRIDGES WERTHEIM BECKER
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Ref: AP/aa/UN 129/0040