

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CCT number: 38/16

In the matter between:

THE MINISTER OF HOME AFFAIRS

First Applicant

**THE DIRECTOR-GENERAL:
DEPARTMENT OF HOME AFFAIRS**

Second Applicant

and

LAWYERS FOR HUMAN RIGHTS

Intervening Party

**NOTICE OF MOTION – APPLICATION FOR CONDONATION FOR THE LATE
FILING OF LAWYERS FOR HUMAN RIGHTS’ HEADS OF ARGUMENT**

BE PLEASED TO TAKE NOTICE that application is hereby made to the above Honourable Court, for an order in the following terms:

1. That the late filing of Lawyers for Human Rights’ heads of argument be condoned;
2. That should the Applicants oppose the granting of this application, they be ordered to pay the costs hereof; and
3. That such further and/or alternative relief be afforded to Lawyers for Human Rights as the Honourable Court may deem fit.

TAKE NOTICE FURTHER that the accompanying affidavit of Nabeelah Mia and the annexures thereto, will be used in support of this application and the relief sought above.

TAKE NOTICE FURTHER that if the Applicants intend to oppose this application, they may do so and may file their notice of opposition and accompanying affidavit by 24 May 2023.

SIGNED at **JOHANNESBURG** on the **22nd** day of **May 2023**.



LAWYERS FOR HUMAN RIGHTS

Attorneys for the Respondent
4th Floor, Heerengracht Building
87 De Korte Street, Braamfontein
Johannesburg
Tel (011) 320 2943
Ref: SLP/14/PTA
Email: nabeelah@lhr.org.za;
tumelo@lhr.org.za;

**TO: THE REGISTRAR
CONSTITUTIONAL COURT OF SOUTH AFRICA
Per email**

**AND TO: THE FIRST APPLICANT:
MINISTER OF HOME AFFAIRS**

**AND TO: THE SECOND APPLICANT:
DIRECTOR GENERAL: DEPARTMENT OF HOME AFFAIRS**

**The First and Second Applicants
served care of:
THE STATE ATTORNEY
SALU BUILDING, GROUND FLOOR
316 THABO SEHUME STREET
PRETORIA
REF: Ms Ntloko
Email: TNtloko@justice.gov.za**