

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

Case No: CCT54/2016

NGHC 2013/3888

In the matter between:-

SOUTH AFRICAN MUNICIPAL WORKER'S UNION

Appellant

and

**THE MINISTER OF CO-OPERATIVE GOVERNANCE
& TRADITIONAL AFFAIRS**

1st Respondent

THE SPEAKER OF THE NATIONAL ASSEMBLY

2nd Respondent

THE CHAIRPERSON OF THE NCOP

3rd Respondent

THE PREMIER OF THE EASTERN CAPE

4th Respondent

THE PREMIER OF THE FREE STATE

5th Respondent

THE PREMIER OF GAUTENG

6th Respondent

THE PREMIER OF KWA – ZULU –NATAL

7th Respondent

THE PREMIER OF MPUMALANGA

8th Respondent

THE PREMIER OF THE NORTHERN CAPE

9th Respondent

THE PREMIER OF LIMPOPO

10th Respondent

THE PREMIER OF NORTH WEST

11th Respondent

THE PREMIER OF THE WESTERN CAPE

12th Respondent

**THE SOUTH AFRICAN LOCAL GOVERNMENT
ASSOCIATION**

13th Respondent

NOTICE OF MOTION

KINDLY TAKE NOTICE that the First Respondent will apply at the hearing of this matter for an order in the following terms :

1. Condonation for the late filing of the heads of argument of the First Respondent;
2. Further and/or alternative relief.

TAKE NOTICE that the affidavit of Fridah Mokgale attached hereto will be used in support of the application

DATED AT PRETORIA ON THIS THE 6th DAY OF SEPTEMBER 2016