

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CC CASE NO.: CCT54/16

HIGH COURT CASE NO.

(GAUTENG DIVISION, PRETORIA) 3558/2013

In the matter between:

SOUTH AFRICAN MUNICIPAL WORKERS' UNION Applicant

and

THE MINISTER OF CO-OPERATIVE GOVERNANCE & TRADITIONAL AFFAIRS	First Respondent
THE SPEAKER OF THE NATIONAL ASSEMBLY	Second Respondent
THE CHAIRPERSON OF THE NATIONAL COUNCIL OF PROVINCES	Third Respondent
THE PREMIER OF THE EASTERN CAPE	Fourth Respondent
THE PREMIER OF THE FREE STATE	Fifth Respondent
THE PREMIER OF GAUTENG	Sixth Respondent
THE PREMIER OF KWAZULU-NATAL	Seventh Respondent
THE PREMIER OF MPUMAL5NGA	Eighth Respondent
THE PREMIER OF THE NORTHERN CAPE	Ninth Respondent
THE PREMIER OF LIMPOPO	Tenth Respondent
THE PREMIER OF NORTH WEST	Eleventh Respondent
THE PREMIER OF THE WESTERN CAPE	Twelfth Respondent
THE SOUTH AFRICAN LOCAL GOVERNMENT ASSOCIATION	Thirteenth Respondent

NOTICE OF APPLICATION

KINDLY TAKE NOTICE THAT the applicant hereby makes application for orders in the following terms:

1. Directing that this application be dealt with in such manner and in accordance with such procedures as may be determined by the Chief Justice.
2. Condoning the applicant's failure to comply with paragraph 3(a) of the Chief Justice's Amended Directions dated 2 June 2012.
3. Directing that any of the respondents who oppose the relief sought, pay the costs thereof, jointly and severally.
4. Granting the applicant further and/or alternative relief.

BE PLEASED TO TAKE NOTICE THAT the affidavit of **GLYN ERIC WILLIAMS** will be used in support of the relief sought.

DATED AT CAPE TOWN ON THIS THE DAY OF AUGUST 2016.

CHENNELLS ALBERTYN

Per:

Applicant's Attorneys

18A Greenwich Grove

Station Road

RONDEBOSCH

Tel No.: (021) 685-8354

Fax No.: (021) 685-0710

Email: info@chennellsalbertyn.co.za

**c/o LISEL VAN RENSBURG
ATTORNEYS**

3rd Floor, 347 Hilda Street

Cnr Hilda & Arcadia Streets

PRETORIA

Tel: (012) 430 6290 / Fax: 086 623 6905

Ref: Mrs van Rensburg/mo/**F270**

**c/o FAIRBRIDGES WERTHEIM
BECKER ATTORNEYS**

Ground Floor

Fricker Road

Illovo

JOHANNESBURG

GAUTENG

(Ref: David Short)

TO: THE REGISTRAR
Constitutional Court
Cnr Queen & Sam Hancock/Hospital Streets
Constitutional Hill
Braamfontein
JOHANNESBURG

AND TO: THE REGISTRAR
High Court
PRETORIA

AND TO: THE STATE ATTORNEY, PRETORIA

First Respondent's Attorneys

Salu Building
316 Thabo Sehume Street
Cnr Thabo Sehume & Francis Baard
PRETORIA
Private Bag X91
PRETORIA
Enq: AGF Mokgale
Ref: 0289/13/Z66/me
Tel: (012) 309 1662
Fax: (012) 309 1649/50

c/o THE STATE ATOTRNEY, JOHANNESBURG

8th Floor, North State Building
95 Albertina Sisulu Street (Cnr Kruis Street)
JOHANNESBURG
Tel: (011) 330 7600
Fax: (011) 333 4856
Ref: Mr V J Dhulam

AND TO: THE STATE ATTORNEY, CAPE TOWN

Second & Third Respondents' Attorneys

Fourth Floor
Liberty Life Centre
22 Long Street
CAPE TOWN
Ref: Mr L Gava
Email: lgava@justice.gov.za
Tel: (021) 441 9200

c/o THE STATE ATOTRNEY, JOHANNESBURG

8th Floor, North State Building
95 Albertina Sisulu Street (Cnr Kruis Street)
JOHANNESBURG
Tel: (011) 330 7600
Fax: (011) 333 4856
Ref: Mr V J Dhulam

AND TO: THE STATE ATTORNEY, CAPE TOWN

Twelfth Respondent's Attorneys

Fourth Floor

Liberty Life Centre

22 Long Street

CAPE TOWN

Ref: Mr L Manuel

Email: lmanuel@justice.gov.za

Tel: (021) 441 9200

c/o THE STATE ATOTRNEY, JOHANNESBURG

8th Floor, North State Building

95 Albertina Sisulu Street (Cnr Kruis Street)

JOHANNESBURG

Tel: (011) 330 7600

Fax: (011) 333 4856

Ref: Mr V J Dhulam