

**IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA**

Case No: **CCT 54/2016**  
NGHC Case No: **3558/2013**

In the matter between: -

**SOUTH AFRICAN MUNICIPAL  
WORKER'S UNION**

Applicant

and

**MINISTER OF CO-OPERATIVE GOVERNANCE  
AND TRADITIONAL AFFAIRS**

First Respondent

**SPEAKER OF NATIONAL COUNCIL OF  
PROVINCES**

Second Respondent

**CHAIRPERSON NATIONAL COUNCIL OF  
PROVINCES**

Third Respondent

**PREMIER OF THE EASTERN CAPE**

Fourth Respondent

**PREMIER OF THE FREE STATE**

Fifth Respondent

**PREMIER OF GAUTENG**

Sixth Respondent

**PREMIER OF KWAZULU-NATAL**

Seventh Respondent

**PREMIER OF MPUMALANGA**

Eighth Respondent

**PREMIER OF THE NORTHERN CAPE**

Ninth Respondent

**PREMIER OF LIMPOPO**

Tenth Respondent

**PREMIER OF NORTH WEST**

Eleventh Respondent

**PREMIER OF THE WESTERN CAPE**

Twelfth Respondent

**SOUTH AFRICAN LOCAL GOVERNMENT  
ASSOCIATION**

Thirteenth Respondent

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**NOTICE OF APPLICATION IN TERMS OF RULE 30**  
**READ WITH**  
**SECTION 19 OF THE SUPERIOR COURTS ACT 10 OF 2013**

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**KINDLY TAKE NOTICE THAT** the Twelfth Respondent will make application at the hearing of this matter for an order in the following terms:

1. Admitting the attached affidavit of **ANTON WILHELM BREDELL** as a further affidavit in these proceedings in terms of Rule 30 of the Rules of this Court, read together with Section 19(b) of the Superior Courts Act 10 of 2013.
2. That any party opposing this application be ordered to pay the costs thereof.
3. Further and/or alternative relief.

**TAKE NOTICE FURTHER** that the Twelfth Respondent has appointed the offices of The State Attorney, 13<sup>th</sup> Floor, North State Building, 95 Market Street, Johannesburg, as the address at which she will accept notice and service of all process in these proceedings.

**TAKE NOTICE FURTHER** that any party wishing to oppose the granting of the order sought herein, should within five (5) days of receipt of this application, notify the Twelfth Respondent's attorneys in writing thereof and deliver an affidavit in answer to the allegations made in this application within the time frames prescribed in the Rules of this Court.

DATED at **CAPE TOWN** on this the                      day of **AUGUST 2016**

**THE STATE ATTORNEY**

Per: \_\_\_\_\_

**L J MANUEL**

Attorneys for the twelfth respondent

4<sup>th</sup> Floor

22 Long Street

**CAPE TOWN**

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[Ref: 883/16/P12]

*c/o*

**THE STATE ATTORNEY**

8<sup>th</sup> Floor North State Building

95 Market Street

**JOHANNESBURG**

[Ref: Mr VJ Dhulam ]

Tel: (011) 330 7660

To: **THE REGISTRAR**  
Constitutional Court  
**BRAAMFONTEIN**

And to: **CHENNELLS ALBERTYN ATTORNEYS**

Attorneys for the applicant

*c/o*

**FAIRBRIDGES WERTHEIM BECKER**

Ground Floor

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Illovo

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[Ref: BW/CHE46/0001]