

**IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA**

**CASE NO.: CCT103/25  
CCT144/25**

In the application for intervention of:

**AMABHUNGANE CENTRE FOR INVESTIGATIVE  
JOURNALISM NPC**

Applicant for intervention

*In re:*

The matter between:

**CASE NO.: CCT 103/25**

**PREMIER OF THE WESTERN CAPE GOVERNMENT**

Applicant

and

**SPEAKER OF THE NATIONAL ASSEMBLY**

First Respondent

**CHAIRPERSON OF THE**

**NATIONAL COUNCIL OF PROVINCES**

Second Respondent

**MINISTER OF FINANCE**

Third Respondent

And the matter between:

**CASE NO.: CCT 144/25**

**THE CITY OF CAPE TOWN**

Applicant

and

**THE SPEAKER OF THE NATIONAL ASSEMBLY**

First Respondent

**THE CHAIRPERSON OF THE**

<b>NATIONAL COUNCIL OF PROVINCES</b>	Second Respondent
<b>THE MINISTER OF FINANCE</b>	Third Respondent
<b>THE PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA</b>	Fourth Respondent
<b>SPEAKER OF THE EASTERN CAPE PROVINCIAL LEGISLATURE</b>	Fifth Respondent
<b>SPEAKER OF THE FREE STATE PROVINCIAL LEGISLATURE</b>	Sixth Respondent
<b>SPEAKER OF THE GAUTENG PROVINCIAL LEGISLATURE</b>	Seventh Respondent
<b>SPEAKER OF THE KWA-ZULU NATAL PROVINCIAL LEGISLATURE</b>	Eighth Respondent
<b>SPEAKER OF THE LIMPOPO PROVINCIAL LEGISLATURE</b>	Ninth Respondent
<b>SPEAKER OF THE MPUMALANGA PROVINCIAL LEGISLATURE</b>	Tenth Respondent
<b>SPEAKER OF THE NORTHERN CAPE PROVINCIAL LEGISLATURE</b>	Eleventh Respondent
<b>SPEAKER OF THE NORTH WEST PROVINCIAL LEGISLATURE</b>	Twelfth Respondent
<b>SPEAKER OF THE WESTERN CAPE PROVINCIAL LEGISLATURE</b>	Thirteenth Respondent

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**NOTICE OF MOTION**

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**TAKE NOTICE** that the intervening applicants, **AMABHUNGANE CENTRE FOR INVESTIGATIVE JOURNALISM NPC** (amaBhungane), intends bringing an application to the above honourable court for the following relief:

1. That amaBhungane be granted leave to intervene as a party in the above matters, under case numbers CCT103/25 and CCT144/25, in terms of Rule 8 of the Constitutional Court Rules.
2. That amaBhungane be granted leave to deliver an affidavit(s) setting out the facts upon which it will rely.
3. That the aforesaid affidavit(s) be delivered within twenty (20) days of an order being granted under this Notice of Motion.
4. That, in the alternative:
  - 4.1. amaBhungane be admitted as an *amicus curiae* in terms of rule 10 of the Constitutional Court Rules;
  - 4.2. amaBhungane be granted leave to deliver an affidavit; and

- 4.3. to the extent necessary, amaBhungane's non-compliance with rule 10 of the Constitutional Court rules be condoned.
5. Directing that the costs of this application be costs in the main matter, save in the event of opposition, in which case any opposing party who opposes the relief sought shall pay amaBhungane's costs (jointly and severally, the one paying the other to be absolved), such costs to include the costs of two counsel.
6. Further and/or alternative relief.

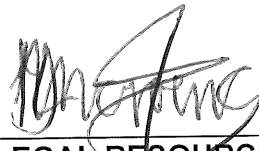
**TAKE NOTICE THAT** the affidavit of **CAROLINE JAMES** together with annexures thereto will be used in support of this application.

**TAKE FURTHER NOTICE** that the Applicant has appointed the **LEGAL RESOURCES CENTRE** at Constitution Hill, 1 Kotze Street, West Wing, Women's Jail, 2nd Floor, Braamfontein, Johannesburg as the address at which it will accept notice and service of all process in these proceedings.

**TAKE NOTICE FURTHER** that if you intend opposing this application, you are required to (a) notify the Applicant's attorney in writing by **11 August 2025** or within 10 days after the lodging of this application, whichever is the latest date: and (b) file your answering affidavit, if any, in accordance with directions to be issued by the Chief Justice and further that you are required to appoint in such notification an

address at which you will accept notice and service of all documents in these proceedings.

DATED AT JOHANNESBURG ON THIS THE 5<sup>TH</sup> DAY OF AUGUST 2025.



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**LEGAL RESOURCES CENTRE**

Attorneys for the Applicant

1 Kotze Street

2<sup>nd</sup> Floor West Wing, Women's Jail

Constitution Hill

Braamfontein

Johannesburg

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Ref: T Moroeng / R Dadoo / C Rankin

TO: **THE REGISTRAR OF THE  
ABOVE HONOURABLE COURT**  
Constitutional Court  
1 Hospital Street  
Constitutional Hill  
Braamfontein

AND TO: **PREMIER OF THE WESTERN CAPE GOVERNMENT**

**C/O STATE ATTORNEY**

Per Lawrence Ngwenya

Per email: [LNgwenya@justice.gov.za](mailto:LNgwenya@justice.gov.za) / [SBedrow@justice.gov.za](mailto:SBedrow@justice.gov.za)

AND TO: **SPEAKER OF THE NATIONAL ASSEMBLY**

**C/O STATE ATTORNEY**

Per L Manuel

Per email: [LManuel@justice.gov.za](mailto:LManuel@justice.gov.za)

AND TO: **CHAIRPERSON OF THE NATIONAL COUNCIL OF PROVINCES**

**C/O STATE ATTORNEY**

Per L Manuel

Per email: [LManuel@justice.gov.za](mailto:LManuel@justice.gov.za)

AND TO: **THE MINISTER OF FINANCE**

**C/O STATE ATTORNEY**

Per L Manuel

Per email: [LManuel@justice.gov.za](mailto:LManuel@justice.gov.za)

AND TO: **CITY OF CAPE TOWN**

**C/O CLUVER MARKOTTER ATTORNEYS**

Per: Mr Brendon Hess / CIT/0189

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AND TO: **THE PRESIDENT OF THE REPUBLIC OF SOUTH AFRICA**

**C/O STATE ATTORNEY**

Per C Bailey

Per email: [CoBailey@justice.gov.za](mailto:CoBailey@justice.gov.za)

AND TO: **SPEAKER OF THE EASTERN CAPE PROVINCIAL  
LEGISLATURE**

**C/O STATE ATTORNEY**

Per K Mosia

Per email: [KMosia@justice.gov.za](mailto:KMosia@justice.gov.za)

AND TO: **SPEAKER OF THE FREE STATE PROVINCIAL LEGISLATURE  
C/O STATE ATTORNEY**

Per L Manuel

Per email: [LManuel@justice.gov.za](mailto:LManuel@justice.gov.za)

AND TO: **SPEAKER OF THE GAUTENG PROVINCIAL LEGISLATURE  
C/O MJOBI & ASSOCIATES**

Per Lubabalo Jayiya

Per email: [lubabablo@jayiyaattorneys.co.za](mailto:lubabablo@jayiyaattorneys.co.za)

AND TO: **SPEAKER OF THE KWAZULU-NATAL PROVINCIAL  
LEGISLATURE**

**C/O GARLICKE & BOUSFIELD INC**

Ref: PM/sa

Per email: [phila.magwaza@gb.co.za](mailto:phila.magwaza@gb.co.za) /  
[stephanie@aproskieattorneys.co.za](mailto:stephanie@aproskieattorneys.co.za)

AND TO: **SPEAKER OF THE LIMPOPO PROVINCIAL LEGISLATURE**

Mowaneng Building

40 Hans van Rensburg Street

POLOKWANE

**C/O STATE ATTORNEY, POLOKWANE**

Fermic Building 65A Landros Mare Street

POLOKWANE

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AND TO: **SPEAKER OF THE MPUMALANGA PROVINCIAL LEGISLATURE  
C/O STATE ATTORNEY**

Per L Manuel

Per email: [LManuel@justice.gov.za](mailto:LManuel@justice.gov.za)

AND TO: **SPEAKER OF THE NORTHERN CAPE PROVINCIAL  
LEGISLATURE**

**C/O STATE ATTORNEY**

Ref: 602/202500408/CD/eb

Per N Gciitshana

Per email: [NGcilitshana@justice.gov.za](mailto:NGcilitshana@justice.gov.za)

AND TO: **SPEAKER OF THE NORTH WEST PROVINCIAL LEGISLATURE  
C/O STATE ATTORNEY**

Per L Matshinyatsimbi

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AND TO: **SPEAKER OF THE WESTERN CAPE PROVINCIAL  
LEGISLATURE**

Provincial Legislature Building

1<sup>st</sup> Floor, 7 Wale Street

CAPE TOWN

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**C/O STATE ATTORNEY**

4<sup>th</sup> Floor, 22 Long Street

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