

IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CASE NO: CCT 144/25

In the matter between:

THE CITY OF CAPE TOWN

Applicant

**AMABHUNGANE CENTRE FOR INVESTIGATIVE
JOURNALISM NPC**

Second Applicant

SOLIDARITY

Third Applicant

and

THE SPEAKER OF THE NATIONAL ASSEMBLY

First Respondent

**THE CHAIRPERSON OF THE NATIONAL COUNCIL
OF PROVINCES**

Second Respondent

THE MINISTER OF FINANCE

Third Respondent

**THE PRESIDENT OF THE REPUBLIC OF SOUTH
AFRICA**

Fourth Respondent

**THE SPEAKER OF THE EASTERN CAPE
PROVINCIAL LEGISLATURE**

Fifth Respondent

**THE SPEAKER OF THE FREE STATE PROVINCIAL
LEGISLATURE**

Sixth Respondent

**THE SPEAKER OF THE GAUTENG PROVINCIAL
LEGISLATURE**

Seventh Respondent

**THE SPEAKER OF THE KWAZULU-NATAL
PROVINCIAL LEGISLATURE**

Eighth Respondent

**THE SPEAKER OF THE LIMPOPO PROVINCIAL
LEGISLATURE**

Ninth Respondent

**THE SPEAKER OF THE MPUMALANGA
PROVINCIAL LEGISLATURE**

Tenth Respondent

**THE SPEAKER OF THE NORTHERN CAPE
PROVINCIAL LEGISLATURE**

Eleventh Respondent

**THE SPEAKER OF THE NORTH WEST PROVINCIAL
LEGISLATURE**

Twelfth Respondent

**THE SPEAKER OF THE WESTERN CAPE
PROVINCIAL LEGISLATURE**

Thirteenth Respondent

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT the first and second respondents hereby apply to the above Honourable Court for an order in the following terms:

1. Condoning the late delivery of the first and second respondents' answering affidavit in response to the third applicant's founding affidavit;

2. Directing the parties with respect to the filing of affidavits and written submissions as follows:
 - a. Any opposing affidavit to the condonation application by the first and second respondents;
 - b. Supplementary written submissions if any on behalf of the third applicant pursuant to receipt of the first and second respondent's answering affidavit in response to the third applicant's founding affidavit; and
 - c. Written submissions on behalf of the first and second respondents in response to the third applicant's initial and supplementary written submissions if any;
3. Directing any party opposing this application to pay the costs thereof, including the costs of three counsel;
4. Further and/or alternative relief.

PLEASE TAKE NOTICE FURTHER THAT the accompanying affidavit of **ANGELA THOKOZILE DIDIZA** (dated 11 March 2026) will be used in support of this application.

SIGNED AT CAPE TOWN **ON THIS THE** 16th **DAY OF** MARCH 2026.

STATE ATTORNEY

Per:

C BAILEY

Third & Fourth
Respondents' Attorney
4th Floor, 22 Long Street

CAPE TOWN

Ref.: 967/25/P20

E-mail: CoBailey@justice.gov.za

C/O THE STATE ATTORNEY

Room 1320, 11th Floor
North State Building
95 Market Street
JOHANNESBURG

TO: THE REGISTRAR
Constitutional Court
No.1 Hospital Street
Constitutional Hill

BRAAMFONTEIN

Email: generaloffice@concourt.org.za

AND TO: CLUVER MARKOTTER ATTORNEYS

Attorney for Applicant
1st Floor, Cluver Markotter Building
Mill Street

STELLENBOSCH

Per: Mr B Hess/CIT/0189

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C/O SWANEPOEL ATTORNEYS

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94 Prichard Street

JOHANNESBURG

E-mail: jjswanepoel@telkomsa.net

roelien@swanepoelattorneys.co.za

AND TO: STATE ATTORNEY CAPE TOWN

First, Second, Sixth, Tenth, Eleventh Respondent and

Twelfth Respondents' Attorney

4th Floor, 22 Long Street

CAPE TOWN

(Ref: 961/25/P12)

Email: LManuel@justice.gov.za

AND TO: LEGAL RESOURCES CENTRE

Attorneys for Intervening Party in CCT 103/25 and Second Intervening
Party in CCT 144/25

2nd Floor West Wing, Women's Jail

1 Kotze Street, Constitutional Hill

Braamfontein

JOHANNESBURG

E-mail: tsukudu@lrc.org.za / rashaad@lrc.org.za / Claire@lrc.org.za

Ref: T Moroeng / R Dadoo / C Rankin

AND TO: SERFONTEIN, VOLJOEN AND SWART

Attorneys for the First Intervening Party in CCT 144/25

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Brooklyn

PRETORIA

E-mail: niekie@svslaw.co.za / monique@svslaw.co.za

AND TO: OFFICE OF THE STATE ATTORNEY, EAST LONDON

Attorney for Fifth Respondent

Old Spoonet Building

17 Fleet Street

EAST LONDON

E-mail: kmosia@justice.gov.za

AND TO: GARLICKE AND BOUSFIELD INCORPORATED

Attorneys for Eighth Respondent

La Lucia Ridge Office Estate

7 Torsvale Crescent

DURBAN

E-mail: phila.magwaza@gb.co.za / stephanie@aproskiattorneys.co.za

AND TO: OFFICE OF THE STATE ATTORNEY

Attorney for Thirteenth Respondent

22 Long Street, 4th Floor

CAPE TOWN

Ref: P11

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