

**SUPREME COURT OF APPEAL OF SOUTH AFRICA**

Case No 536/2020  
GP Case No 21542/2020

In the application of:

**COUNCIL FOR THE ADVANCEMENT OF THE  
SOUTH AFRICAN CONSTITUTION**

Applicant *Amicus Curiae*

In re:

**MINISTER OF COOPERATIVE GOVERNMENT**

Appellant

and

**REYNO DAWID DE BEER**

First Respondent

**LIBERTY FIGHTERS NETWORK**

Second Respondent

**HOLA BON RENAISSANCE FOUNDATION**

Third Respondent

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**NOTICE OF MOTION:**

**APPLICATION FOR LEAVE TO INTERENE AS *AMICUS CURIAE***

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**KINDLY TAKE NOTICE THAT** the Council for the Advancement of the South African Constitution (“**CASAC**”) hereby applies for an order in the following terms:

- 1 That CASAC is admitted as amicus curiae in these proceedings in terms of rule 16(4) of the Supreme Court of Appeal Rules;
- 2 That CASAC is granted leave to:
  - 2.1 deliver written argument in this matter on a date and on terms determined by the President; and

2.2 present oral argument at the hearing of this matter.

3 Further and / or alternative relief.

**TAKE NOTICE FURTHER THAT** the affidavit of **PARMANANDA LAWSON NAIDOO** will be used in support of this application.

**TAKE NOTICE FURTHER THAT** the applicant has appointed as its attorneys **NORTON ROSE FULBRIGHT INC c/o LOVIUS BLOCK ATTORNEYS**, at the address set out below, where it will accept service of all notices, documents and other process connected with these proceedings. The applicant will accept electronic email service.

Signed at Cape Town on 20 October 2020.



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To: The Registrar of the Supreme Court of Appeal  
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Tel: (051) 412 7400  
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**Ref: 536/2020**  
**Ref: Mr Myburgh**  
**21542/2020 DAVIS JJ (Court a quo)**

And to: **The State Attorney Bloemfontein**  
**For: Minister of Cooperative Governance**  
49 Charlotte Maxeke St  
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Bloemfontein, 9301  
Tel: 051 400 4300  
**Ref: 239/202000538 P1 D**  
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And to: **Reyno De Beer**  
1<sup>st</sup> and 2<sup>nd</sup> Respondent  
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And to: **Msieleng Attorneys**  
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