

THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CCT Case no: 69/21

SCA Case no: 1105/2019

HC Case no: 11488/17P

In the matter between:

GLOBAL ENVIRONMENTAL TRUST First Applicant

**MFOLOZI COMMUNITY ENVIRONMENTAL
JUSTICE ORGANISATION** Second Applicant

and

TENDELE COAL MINING (PTY) LTD First Respondent

MINISTER OF MINERALS AND ENERGY Second Respondent

**MEC: DEPARTMENT OF ECONOMIC DEVELOPMENT,
TOURISM AND ENVIRONMENTAL AFFAIRS** Third Respondent

MINISTER OF ENVIRONMENTAL AFFAIRS Fourth Respondent

MTUBATUBA MUNICIPALITY Fifth Respondent

HLABISA MUNICIPALITY Sixth Respondent

INGONYAMA TRUST Seventh Respondent

EZEMVELO KZN WILDLIFE Eighth Respondent

AMAFA aKWAZULU-NATALI HERITAGE COUNCIL	Ninth Respondent
CENTRE FOR ENVIRONMENTAL RIGHTS	Amicus Curiae
MPUKUNYONI TRADITIONAL COUNCIL	Amicus Curiae
MPUKUNYONI COMMUNITY MINING FORUM	Amicus Curiae
THE ASSOCIATION OF MINE WORKERS AND CONSTRUCTION UNION	Amicus Curiae
THE NATIONAL UNION OF MINEWORKERS	Amicus Curiae

NOTICE OF MOTION

KINDLY TAKE NOTICE THAT the applicants apply to the above Honourable Court for an order in the following terms:

1. The applicants are granted leave to file a replying affidavit to the first respondent's answering affidavit filed on 16 March 2021 and that the affidavit which accompanies this application be admitted as the replying affidavit;

KINDLY TAKE NOTICE FURTHER that the affidavit of **Sifiso Senzo Dladla** and its annexures shall be used in support of this application.

DATED AND SIGNED AT PARKTOWN ON 8TH DAY OF APRIL 2021.



YOUENS ATTORNEYS

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TO: THE REGISTRAR OF THE CONSTITUTIONAL COURT

JOHANNESBURG

AND TO:

MALAN SCHOLES INC.

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AND TO:

NGCAMU INC.

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AND TO AMICUS CURIAE:

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