

**IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION, PRETORIA**

Case No: 20341/19

In the matter between:

MINERALS COUNCIL SOUTH AFRICA	Applicant
and	
MINISTER OF MINERAL RESOURCES AND ENERGY	First Respondent
SOUTH AFRICAN DIAMOND AND PRECIOUS METALS REGULATOR	Second Respondent
MINING AFFECTED COMMUNITIES UNITED IN ACTION	Third Respondent
WOMEN AFFECTED BY MINING IN ACTION	Fourth Respondent
MINING AND ENVIRONMENTAL JUSTICE COMMUNITY NETWORK OF SOUTH AFRICA	Fifth Respondent
BAKGATLA BA SEFIKILE COMMUNITY	Sixth Respondent
LESETHLENG COMMUNITY	Seventh Respondent
BABINA PHUTI BA GA-MAKOLA	Eight Respondent
KGATLU COMMUNITY	Ninth Respondent
ASSOCIATION OF MINEWORKERS AND CONSTRUCTION UNION	Tenth Respondent
UNITED ASSOCIATION OF SOUTH AFRICA	Eleventh Respondent
NATIONAL UNION OF MINEWORKERS	Twelfth Respondent
SOLIDARITY TRADE UNION	Thirteenth Respondent
SOUTH AFRICAN MINING DEVELOPMENT ASSOCIATION	Fourteenth Respondent

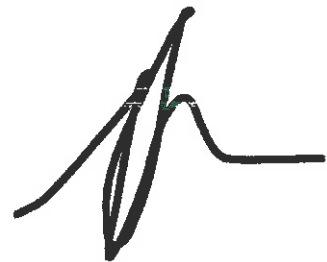
NOTICE OF INTENTION TO OPPOSE

TAKE NOTICE THAT the Fifth Respondent hereby gives notice of its intention to oppose the application.

TAKE FURTHER NOTICE that the Fifth Respondent has appointed Centre for Environmental Rights as its attorneys of record and will accept service of all pleadings and notices in this matter at the address of the afore-mentioned attorneys.

In addition to the physical address referred to below, the Fifth Respondent is prepared to accept service of all subsequent documents and notices at its attorneys' electronic mail address set out below.

DATED AND SIGNED AT PRETORIA ON THIS THE 13TH OF AUGUST 2020.



CENTRE FOR ENVIRONMENTAL RIGHTS
Attorneys for the Fifth Respondents
2nd Floor, Springtime Studios
1 Scott Road
Observatory
Cape Town
Tel: 021 447 1647
Email: tmugunyani@cer.org.za / tgumede@cer.org.za
Ref: Tarisai Mugunyani/ Thobeka Gumede
c/o **GILDNHUYS MALATJI INC**

Harlequins Office Park
164 Toitus Street
Groenkloof
Tel: 012 428 8608
Fax: 086 577 7237
Email: [jmalberger@gminc.co.za](mailto:jsmalberger@gminc.co.za)
Ref: J. Smalberger/ 01921290

**TO: THE REGISTRAR OF THE HIGH COURT
PRETORIA**

**AND TO: NORTON ROSE FULBRIGHT AFRICA INC
ATTORNEYS FOR THE APPLICANT
15 Alice Lane, Sandton
Tel: 011 685 8500
Fax: 011 301 3200
Ref: CMI264/Mr AP Vos/Ms K Kalyan
C/O MOTHLE JOOMA SABDIA INC
Ground Floor, Duncan Manor
Cnr. Jan Shoba (Duncan) and Brooks Street
Brooklyn
Pretoria
Tel: (012) 363 3137
Fax: (012) 362 4139
Email: ebrahimj@mjs-inc.co.za
Ref: Mr Jooma/srn**

**AND TO: MINISTER OF MINERAL RESOURCES
c/o THE STATE ATTORNEY
ATTORNEYS FOR THE FIRST RESPONDENT
SALU Building
255 Francis Baard Street
Pretoria
Tel: (012) 309 1575
Email: simathebula@justice.gov.za
Ref: Mr Sipho Mathebula**