

**IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA**

**CASE NO CCT142/21**

**SUPREME COURT OF APPEAL CASE NO 1065/19**

**GP CASE NO 6175/19**

In the matter between:

**HELEN SUZMAN FOUNDATION**

Applicant

and

**ROBERT McBRIDE**

First Respondent

**THE INDEPENDENT POLICE INVESTIGATIVE  
DIRECTORATE**

Second Respondent

**MINISTER OF POLICE**

Third Respondent

**PORTFOLIO COMMITTEE ON POLICE:  
NATIONAL ASSEMBLY**

Fourth Respondent

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**NOTICE OF APPLICATION FOR LEAVE TO FILE CONDITIONAL REPLYING  
AFFIDAVIT**

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**TAKE NOTICE THAT** the applicant hereby makes application for an order in the following terms:

1. the applicant is granted leave to file its conditional replying affidavit, dated 2 June 2021 ("**the replying affidavit**");
2. any respondent opposing the filing of the replying affidavit shall pay the applicant's costs of the application, jointly and severally with any other opposing respondents, the one paying the other(s) to be absolved;


3. granting the applicant further and / or alternative relief.

**TAKE NOTICE FURTHER** that the accompanying affidavit of **FRANCIS ANTONIE** will be used in support of this application.

**TAKE NOTICE FURTHER** that the applicant has appointed the address of the applicant's attorneys, Webber Wentzel, detailed below, as the address at which the applicant will accept notice and service of all process in connection with this application.

**TAKE NOTICE FURTHER** that if any respondent wishes to oppose this application, he / she / it is required, at the earlier of a date stipulated by the Chief Justice or within ten days from the date of service of this application, to file an answering affidavit.

Dated at Johannesburg on this 3<sup>rd</sup> day of June 2021.



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**Applicant's attorneys**  
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Ref: V Movshovich / P Dela / D Cron / L Pillay

To:

**THE REGISTRAR**

Constitutional Court of South Africa  
Braamfontein

AND TO:

**ADAMS & ADAMS**

**First and second respondents' attorneys**

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**BY EMAIL**

AND TO:

**THE STATE ATTORNEY, PRETORIA**

**Third and fourth respondents' attorneys**

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Ref: 00418/2019 /Z64/jb

**BY EMAIL**