

**IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA, BRAAMFONTEIN**

**CC CASE NUMBER: 52/2021**

**In the application of:**

**DEMOCRACY IN ACTION**

**Applicant**

**Re: Application for admission as *Amicus Curiae***

**In the matter between:**

**JACOB GEDLEYIHLEKISA ZUMA**

**Applicant**

**and**

**SECRETARY OF THE JUDICIAL COMMISSION OF  
INQUIRY INTO ALLEGATIONS OF STATE CAPTURE,  
CORRUPTION AND FRAUD IN THE PUBLIC SECTOR  
INCLUDING ORGANS OF STATE**

**First Respondent**

**RAYMOND MNYAMEZELI ZONDO N.O**

**Second Respondent**

**MINISTER OF POLICE**

**Third Respondent**

**NATIONAL COMMISSIONER OF THE SOUTH  
AFRICAN POLICE SERVICE**

**Fourth Respondent**

**HELEN SUZMAN FOUNDATION**

**Fifth Respondent**

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**NOTICE OF APPLICATION TO BE ADMITTED AS *AMICUS CURIAE***

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

1. Admitting DIA as amicus curiae in these proceedings.
2. Condoning DIA's non-compliance with the time periods prescribed in Rule 10 for the securing of the written consent of all parties in the

proceedings and/or the making of application for admission as amicus curiae where no such written consent has been secured.

3. That the applicant is granted leave to lodge written submissions on a date to be determined by the Court and to present oral argument at the hearing of this matter.
4. That any party opposing this application is ordered to pay the applicant's costs, including the costs of two Counsel.
5. Granting further and/or alternative relief.

**TAKE NOTICE FURTHER THAT** if any of the parties intends to oppose the relief sought in this application, they are required to give notice of their intention to do so and file any answering papers by 17h00 on 8 July 2021, subject to any directions that the Honorable Acting Chief Justice may give in relation to these time periods or any further conduct of this application.

**TAKE NOTICE FURTHER THAT** the affidavit of **THABO PRINCE MTSWENI**, together with annexures thereto, will be used in support of this application.

**TAKE NOTICE FURTHER THAT** the applicant will accept notice and service of all documents in these proceedings at the address and/email set out below, marked for the attention of **Mr. D. Magabane**

**DATED AT BRAAMFONTEIN ON THIS 07 DAY OF JULY 2021.**

  
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**K D MAGABANE & ASSOCIATES INC.**

Applicant's Attorneys

**C/O B.D - MNDITAYA ATTORNEYS**

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**TO: MR. DUNIANI MATHIBA  
ACTING REGISTRAR  
CONSTITUTIONAL COURT**

**AND TO: THE STATE ATTORNEY JOHANNESBURG  
ATTORNEYS FOR THE FIRST AND SECOND RESPONDENT**

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**JOHANNESBURG**

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**AND TO: NTANGA NKUHULU INCORPORATED**

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C/O M NDIMA INCORPARATED

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K.D

**AND TO: THE STATE ATTORNEY PRETORIA  
ATTORNEYS For The Third And Fourth Respondent**

316 THABO SCHUME STREET

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**PRETORIA**

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**AND TO: Webber WENTZEL INCORPORATED**

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