

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

Case No: 32323/2022

In the matter between:

HELEN SUZMAN FOUNDATION

Applicant

and

MINISTER OF HOME AFFAIRS

First Respondent

DIRECTOR GENERAL OF HOME AFFAIRS

Second Respondent

**APPLICANT'S NOTICE IN TERMS OF RULE 35(12); *ALTERNATIVELY* RULE 35
(14)**

KINDLY TAKE NOTICE THAT the Applicant hereby requests, in terms of Rule 35(12), *alternatively* Rule 35(14) of the Uniform Rules of Court, that the Respondents produce, within 5 (five) days of this notice, for inspection the following documents referred to in the Respondents' answering affidavit and/or which are relevant to the reasonably

anticipated issues in the application and are required for the purposes of preparing a replying affidavit, and to allow for copies of such documents to be made:

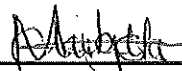
- 1 All documents relating to the representations that have allegedly been made by the 6 000 ZEP holders to the First Respondent regarding the 12-month extension period, as referred to in paragraphs 33, 34, 54, 159, 172 and 208 of the answering affidavit. Which consists of:
 - 1.1 the representations made by the 6000 ZEP holders; and
 - 1.2 all correspondence exchanged between the Department of Home Affairs (DHA) and these ZEP holders regarding their representations.

- 2 The applications made to the DHA, by the 4 000 ZEP holders, to waive the Department of Labour requirements contained in Regulation 18(3) of the Immigration Regulations promulgated in terms of the Immigration Act, 2002, as referred to in paragraphs 71 and 172 of the answering affidavit, including documents showing:
 - 2.1 how many of these waivers have been granted by the Minister;
 - 2.2 how many have been refused; and
 - 2.3 how many waiver applications are still being considered.

- 3 Documents relating to any representations made by the Zimbabwean Diaspora Association in South Africa NPC and/or African Amity NPC following the letters addressed to both organisations, as referred to in paragraphs 160.6, 160.7 and 176.2 of the answering affidavit.

- 4 Any documents, including minutes, of the deliberations of the Department and the Minister on the question of the impact on children and families, as referred to in paragraph 255 of the answering affidavit.

DATED at **JOHANNESBURG** on this the 18th day of **AUGUST 2022**.



DLA PIPER SOUTH AFRICA (RF) INC.

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

AND TO: SIGOGO ATTORNEYS
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BY EMAIL