

**IN THE HIGH COURT OF SOUTH AFRICA  
GAUTENG LOCAL DIVISION, JOHANNESBURG**

Case No. 32777/2020

In the application for admission as *amicus curiae* of:

**HUMAN RIGHTS WATCH**

Applicant

In the matter between:

**VARIOUS PARTIES ON BEHALF OF MINORS**

First to twelfth applicants

████████████████████

Thirteenth applicant

and

**ANGLO AMERICAN SOUTH AFRICA LIMITED**

Respondent

with

**AMNESTY INTERNATIONAL**

First *amicus curiae*

**THE SOUTHERN AFRICAN LITIGATION CENTRE**

Second *amicus curiae*

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**NOTICE OF MOTION**

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**TAKE NOTICE** that Human Rights Watch hereby makes application for an order in the following terms:

1. That Human Rights Watch is admitted as *amicus curiae* in the above matter.
2. That Human Rights Watch is granted leave to file written submissions and to present oral submissions at the hearing of this matter subject to any directions issued by the court.

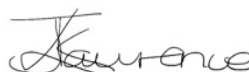
3. To the extent necessary, that Human Rights Watch's non-compliance with the time periods provided for in rule 16A of the Uniform Rules of Court is condoned.
4. That any party opposing this application is ordered to pay Human Rights Watch's costs, including the costs of two counsel.
5. Granting further and / or alternative relief.

**TAKE NOTICE FURTHER** that if any of the parties intend to oppose the relief sought in this application, they are required to deliver an answering affidavit by 4 November 2022 as directed by the Deputy Judge President.

**TAKE NOTICE FURTHER** that the affidavit of **ASHWANEE BUDOO**, together with annexes thereto, will be used in support of this application.

**TAKE NOTICE FURTHER** that Human Rights Watch has appointed LAWYERS FOR HUMAN RIGHTS as their attorneys of record and will accept notice and service of all documents in these proceedings at the address set out below or via email at the following email addresses: [JessicaL@lhr.org.za](mailto:JessicaL@lhr.org.za) and [Palesa@lhr.org.za](mailto:Palesa@lhr.org.za).

DATED AT JOHANNESBURG ON THIS 28<sup>TH</sup> DAY OF OCTOBER 2022



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**LAWYERS FOR HUMAN RIGHTS**  
Human Rights Watch's attorneys  
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87 De Korte Street

Johannesburg, 2001  
T: (011) 339 1960  
E: JessicaL@lhr.org.za

**AND TO:  
THE REGISTRAR OF THE HIGH COURT  
GAUTENG LOCAL DIVISION, JOHANNESBURG**

**AND TO:  
MBUYISA MOLEELE ATTORNEYS**  
Applicants' attorneys  
5<sup>th</sup> Floor, JCCI House  
27 Owl Street  
Milpark, Johannesburg  
T: 067 070 5130  
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**AND TO:  
WEBBER WENTZEL**  
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90 Rivonia Road  
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**AND TO:  
CENTRE FOR APPLIED LEGAL STUDIES**  
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