

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

CASE NO: 2020/32777

In the application of:

**THE UNITED NATIONS SPECIAL RAPPORTEUR
ON TOXICS AND HUMAN RIGHTS**

Third applicant for admission
as amicus curiae

**THE UNITED NATIONS SPECIAL
RAPPORTEUR ON EXTREME POVERTY
AND HUMAN RIGHTS**

Fourth applicant for admission
as amicus curiae

**THE UNITED NATIONS SPECIAL
RAPPORTEUR ON THE RIGHTS OF
PERSONS WITH DISABILITIES**

Fifth applicant for admission
as amicus curiae

**THE UNITED NATIONS WORKING GROUP
ON BUSINESS AND HUMAN RIGHTS**

Sixth applicant for admission
as amicus curiae

**THE UNITED NATIONS WORKING
GROUP ON DISCRIMINATION AGAINST
WOMEN AND GIRLS**

Seventh applicant for admission
as amicus curiae

In the matter between:

VARIOUS PARTIES ON BEHALF OF MINORS

First to Twelfth Applicants

[REDACTED]

Thirteenth Applicant

and

ANGLO AMERICAN SOUTH AFRICA LIMITED

Respondent

and

AMNESTY INTERNATIONAL

First Applicant for admission
as *amicus curiae*

**THE SOUTHERN AFRICAN
LITIGATION CENTRE**

Second Applicant for admission
as *amicus curiae*

NOTICE OF MOTION

PLEASE TAKE NOTICE that the third to seventh applicants for admission as *amici curiae* apply for an order in the following terms:

1. The third to seventh applicants for admission as *amici curiae* are admitted as the third to seventh *amici curiae*.
2. To the extent necessary, the third to seventh *amici curiae* are granted leave to adduce the evidence set out in the founding affidavit of Marcos A. Orellana.
3. The third to seventh *amici curiae* are granted the right to file written submissions and present oral submissions at the hearing of this matter.
4. If the application is opposed, any party opposing is ordered to pay the costs.
5. Further or alternative relief.

TAKE NOTICE FURTHER that the attached affidavit of **MARCOS ANDRÉS ORELLANA** will be used in support of this application.

TAKE NOTICE FURTHER that the applicants for admission as *amicus curiae* have appointed the offices of the **LEGAL RESOURCES CENTRE** at the address set out below as the address at which it will accept notice and service of all documents in these proceedings.

DATED AT JOHANNESBURG ON THIS 28th DAY OF OCTOBER 2022.

A handwritten signature in black ink, appearing to read 'E Deochand', is written over a horizontal line.

LEGAL RESOURCES CENTRE

E Deochand

Applicants' Attorneys

2nd Floor, West Wing, Women's Jail

Constitutional Hill

1 Kotze Street

Braamfontein

Johannesburg

Tel: (011) 038 9709

Email: ektaa@lrc.org.za

Ref: Deochand/Wicomb/Samuel

**TO: THE REGISTRAR OF THE ABOVE HONOURABLE COURT
JOHANNESBURG**

**AND TO: MBUYISA MOLEELE ATTORNEYS
ATTORNEYS FOR THE APPLICANTS**
5TH FLOOR, JCCI HOUSE
27 OWL STREET
MILPARK
JOHANNESBURG
TEL: 067 070 5130
EMAIL: zanele@mbmlaw.co.za

**AND TO: WEBBER WENTZEL
ATTORNEYS FOR THE RESPONDENT**
90 RIVONIA ROAD, SANDTON
JOHANNESBURG, 2196
PO BOX 61771, MARSHALLTOWN
JOHANNESBURG, 2017
TEL: 011 530 5339
FAX: 011 530 6339
EMAIL: nick.alp@webberwentzel.com
REF: N. Alp / P. Soni

**AND TO: CENTRE FOR APPLIED LEGAL STUDIES
ATTORNEYS FOR THE FIRST AND SECOND AMICI CURIAE**
DJ DU PLESSIS BUILDING
WEST CAMPUS
UNIVERSITY OF THE WITWATERSRAND
BRAAMFONTEIN
TEL: 083 390 4480
EMAIL: ariella.scher@wits.ac.za / anesu.drea@wits.ac.za
REF: A Scher / A Dera