## IN THE CONSTITUTIONAL COURT OF SOUTH AFRICA

CCT CASE NO: 19/2022

HCGDP NO: 32097/2020

In the matter between:

ROAD TRAFFIC MANAGEMENT CORPORATION

APPLICANT

and

ORGANISATION UNDOING TAX ABUSE

FIRST RESPONDENT

MINISTER OF TRANSPORT

SECOND RESPONDENT

MINISTER OF CO-OPERATIVE GOVERNANCE

AND TRADITIONAL AFFAIRS

THIRD RESPONDENT

ROAD TRAFFIC INFRINGEMENT AUTHORITY

**FOURTH RESPONDENT** 

**APPEALS TRIBUNAL** 

FIFTH RESPONDENT

In re the matter between:

**ORGANISATION UNDOING TAX ABUSE** 

**APPLICANT** 

and

MINISTER OF TRANSPORT

FIRST RESPONDENT

MINISTER OF CO-OPERATIVE GOVERNANCE

AND TRADITIONAL AFFAIRS

SECOND RESPONDENT

ROAD TRAFFIC INFRINGEMENT AUTHORITY

THIRD RESPONDENT

APPEALS TRIBUNAL

**FOURTH RESPONDENT** 

## NOTE OF INTENTION TO OPPOSE

KINDLY TAKE NOTICE THAT the First Respondent (Organisation Undoing Tax Abuse) intends to oppose the application launched by the Applicant (Road Traffic Management Corporation) and appoints the address as set out below as the address at which service may be affected.

## DATED AT JOHANNESBURG ON THIS 15<sup>TH</sup> DAY OF MARCH 2022.

JENNINGS INCORPORATED

MAINAN

ATTORNEYS FOR THE APPLICANT/FIRST RESPONDENT

222 SMIT STREET

21<sup>ST</sup> FLOOR

**BRAAMFONTEIN** 

**JOHANNESBURG** 

TEL: 012 110 4442/TEL: 010 005 4572

EMAIL: andri@jinc.co.za

REF: A JENNINGS/OUT002/CC

TO:

THE REGISTRAR

CONSTITUTIONAL COURT

AND TO:

**NOKO RAMABOYA ATTORNEYS** 

ATTORNEYS FOR THE ROAD TRAFFIC MANAGEMENT

CORPORATION

927 STANZA BOPAPE STREET

ARCADIA

PRETORIA

TEL: 012 323 7777

EMAIL: Victorn@nokoinc.co.za and Matshepom@nokoinc.co.za

C/O KEKANA HLATSHWAYO RADEBE ATTORNEYS

1ST FLOOR

PRINCESS OF WALES TERRACE

31 PRINCESS OF WALES STREET

PARKTOWN

**JOHANNESBURG** 

AND TO: **STATE ATTORNEY - PRETORIA** 

ATTORNEY FOR THE MINISTER OF TRANSPORT

SALU BUILDING

316 THABO SEHUME AND FRANCIS BAARD STREETS

REF: 2562/2020/Z22 TEL: 012 309 1578

EMAIL: nagonggo@justice.gov.za

AND TO: MNCEDISI NDLOVU & SEDUMEDI ATTORNEYS

ATTORNEYS FOR THE ROAD TRAFFIC INFRINGEMENT AGENCY

2<sup>ND</sup> FLOOR, 16 FRICKER ROAD

**IILOVO** 

2196

TEL: 011 268 5225

FAX: 011 268 6805

EMAIL: <u>feziwe@ndlovu-sedumedi.co.za</u>

thami@ndlovu-sedumedi.co.za

C/O MPONYA LEDWABA INC

194 BLACKWOOD STREET

ARCADIA

**PRETORIA**