

IN THE HIGH COURT OF SOUTH AFRICA  
GAUTENG DIVISION, PRETORIA

**ORIGINAL**

**CASE NO: 23017/2022**

In the matter between:

**ORGANISATION UNDOING TAX ABUSE NPC**

Applicant

Registration Number: 2012/064213/08

and

**THE NATIONAL ENERGY REGULATORY  
SOUTH AFRICA**

First Respondent

**KARPOWERSHIP SA COEGA (RF) (PTY) LTD**

Registration Number: 2020/754336/07)

Second Respondent

**KARPOWERSHIP SA SALDANHA BAY (RF) (PTY) LTD**

Registration Number: 2020/754347/07)

Third Respondent

**KARPOWERSHIP SA RIHARDS BAY (RF) (PTY) LTD**

Registration Number: 2020/754352/07)

Fourth Respondent

**KARPOWERSHIP SA (PTY) LTD**

Registration Number: 2019/537869/07)

Fifth Respondent

**MINISTER OF MINERAL RESOURCES AND  
ENERGY N.O**

Sixth Respondent

**MINISTER OF FORESTY, FISHERIES  
AND THE ENVIRONMENT N.O**

Seventh Respondent

**ESKOM HOLDINGS (SOC) LTD**

(Registration Number: 2002/015527/30)

Eighth Respondent

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**NOTICE OF INTENTION TO OPPOSE**

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**TAKE NOTICE** that the First Respondent hereby gives a notice of its intention to oppose the application.

**TAKE FURTHER NOTICE** that the First Respondent hereby appoints **Prince Mudau & Associates** as its attorneys of record, at the address as set out below, at which address it will accept service of all of processes, notices, and documents in this action.

Dated at **Midrand** on this **18<sup>th</sup>** day of **May 2022**



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**PRINCE MUDAU & ASSOCIATES**

First Respondent's Attorneys

THORNHILL OFFICE PARK

BUILDING 2

94 BEKKER ROAD

VORNA VALLEY, MIDRAND

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**C/O DABISHI NTHAMBELENI INC**

103 DOREEN STREET

COLBYN, HATFIELD

PRETORIA

**REF: LIT/PM/MAT180**

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

**AND TO: JENNINGS INCORPORATED**

Attorneys for the Applicant  
149 ANDERSON STREET  
BROOKLYN  
PRETORIA, 0011  
Tel: 012 110 4442  
Email: [andri@jinc.co.za](mailto:andri@jinc.co.za)  
REF: A JENNINGS/OUT015

**AND TO: KARPOWERSHIP SA COEGA (RF) (PTY) LTD**

Second Respondent  
164 TOTIUS STREET  
GROENKLOOF  
PRETORIA  
0027

**AND TO: KARPOWERSHIP SA SALDANHA BAY (RF) (PTY) LTD**

Third Respondent  
164 TOTIUS STREET  
GROENKLOOF  
PRETORIA  
0027

**AND TO: KARPOWERSHIP SA RICHARDS BAY (RF) (PTY) LTD**

Fourth Respondent  
164 TOTIUS STREET  
GROENKLOOF  
PRETORIA  
0027

**AND TO: KARPOWERSHIP SA (RF) (PTY) LTD**

Fifth Respondent  
164 TOTIUS STREET  
GROENKLOOF  
PRETORIA  
0027

**AND TO: THE MINISTER OF MINERAL RESOURCES AND ENERGY N.O.**  
Sixth Respondent  
C/O THE STATE ATTORNEY  
SALU BUILDING  
316 THABO SEHUME STREET  
PRETORIA

**AND TO: THE DIRECTOR-GENERAL OF THE DEPARTMENT OF MINERAL RESOURCES AND ENERGY**  
TREVENNA CAMPUS  
71 MEINTJES STREET  
CNR MADIBA & FRANCIS BAARD STREETS  
BLOCK 2B 2<sup>ND</sup> FLOOR  
SUNNYSIDE  
PRETORIA

**AND TO: THE MINISTER OF FORESTRY, FISHERIES, AND THE ENVIRONMENT N.O.**  
Seventh Respondent  
C/O THE STATE ATTORNEY  
SALU BUILDING  
316 THABO SEHUME STREET  
PRETORIA

**AND TO: THE DIRECTOR-GENERAL OF THE DEPARTMENT OF FORESTRY, FISHERIES, AND THE ENVIRONMENT**  
472 STEVE BIKO ROAD  
CNR STEVE BIKO & SOUTPANSBERG ROADS  
ARCADIA  
PRETORIA

**AND TO: ESKOM HOLDINGS (SOC) LTD**  
Eighth Respondent  
MEGAWATT PARK  
2 MAXWELL DRIVE  
SUNNINGHILL  
JOHANNESBURG