

COURT ONLINE COVER PAGE

IN THE HIGH COURT OF SOUTH AFRICA
Gauteng Local Division, Johannesburg

CASE NO: **2025-092906**

In the matter between:

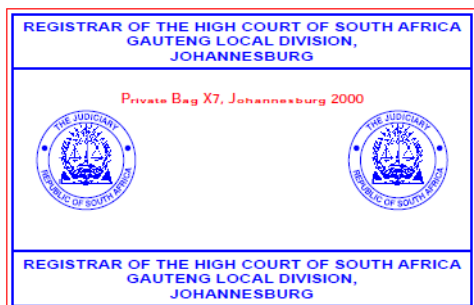
ORGANISATION UNDOING TAX ABUSE NPC Plaintiff / Applicant / Appellant

and

CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY, THE MUNICIPAL MANAGER CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY, THE EXECUTIVE MAYOR CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY Defendant / Respondent

Notice of Motion (Long Form)

NOTE: This document was filed electronically by the Registrar on 18/6/2025 at 3:33:01 PM South African Standard Time (SAST). The time and date the document was filed by the party is presented on the header of each page of this document.



ELECTR  SIGNED BY:

**Registrar of High Court , Gauteng
Local Division, Johannesburg**

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

Case No: _____

In the matter between

ORGANISATION AGAINST TAX ABUSE NPC

(Registration no: 2012/064213/08)

Applicant

and

**CITY OF JOHANNESBURG METROPOLITAN
MUNICIPALITY**

First Respondent

**THE MUNICIPAL MANAGER
CITY OF JOHANNESBURG METROPOLITAN
MUNICIPALITY**

Second Respondent

**THE EXECUTIVE MAYOR
CITY OF JOHANNESBURG METROPOLITAN
MUNICIPALITY**

Third Respondent



NOTICE OF MOTION

TAKE NOTICE that the Applicant intends to make application for an order in the following terms:

1. Declaring that the First Respondent's Privately-owned Closed-circuit Television Surveillance Camera By-Law ("the By-Law") is invalid, unconstitutional, and is set aside.
2. *Alternatively*, declaring such portions of the First Respondent's By-Law constitutionally invalid as the Court deems fit and is set aside accordingly.
3. The First Respondent is ordered to pay the costs of this application on the scale as between attorney and client, including costs of counsel on scale C.
4. Further and/or alternative relief.



TAKE NOTICE FURTHER that the First to Third Respondents are called upon, in terms of Uniform Rule of Court 53(1)(a), to show cause why the By-Law referred to above should not be reviewed, declared constitutionally invalid and set aside.

TAKE NOTICE FURTHER that the First, Second and Third Respondents are hereby called upon to dispatch within 15 (fifteen) days after receipt of this notice of motion, to the Registrar of the above honourable Court:

- a) all records, including internal memoranda, directives, policy documents, records of deliberations, all records pertaining to public participation, minutes of committee and council meetings and any other documents relating to the entire process of adopting and promulgating the By-Law;
- b) such full reasons for the decision(s) as the First Respondent can give in relation thereto, and

- c) to notify the Applicant that it has done so and to fully comply with Rule 53(1)(b) of the High Court Rules.

TAKE FURTHER NOTICE that the facts and circumstances upon which the Applicants rely to have the decision set aside appear from the affidavit deposed to by Stefanie Fick attached hereto.

TAKE FURTHER NOTICE that the Applicant may, within 10 days after the Registrar of this Court has made the record filed by the First, Second and Third Respondents available to them, amend, add to or vary the terms of this notice of motion and supplement same with a supporting affidavit.



TAKE FURTHER NOTICE that if the First, Second and Third Respondents or any of the remaining Respondents desire to oppose the granting of the order prayed in this notice of motion, it shall:

- a. within 15 days after receipt by them of this notice of motion or any amendment thereof in terms of Rule 53(4), deliver to the applicant a notice stating that they intend to oppose the relief sought in this notice of motion and shall in such notice appoint an address within 15 kilometres of the office of the Registrar of this Court at which they shall accept notice and service of all process in these proceedings; and
- b. within 30 days after the expiry of the time referred to in Rule 53(4), deliver any affidavits they may desire to deliver in answer to the allegations made by the applicants in these proceedings.

TAKE NOTICE FURTHER that the Applicant appoints as its attorneys the attorneys whose address is set out hereunder, at whose offices it shall accept notice and service of all process in these proceedings.

TAKE FURTHER NOTICE if no such intention to oppose is given, the application will be set down for hearing at a date and time to be arranged with the Registrar of the above honourable Court.

Kindly enrol this application accordingly.

Signed at Johannesburg on this 18th day of June 2025




JENNINGS INCORPORATED
ATTORNEYS FOR THE APPLICANT
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Ref: A Jennings/OUT039
Email: andri@jinc.co.za / delia@jinc.co.za

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

AND TO: CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY

The First Respondent

Metropolitan Centre Building

158 Civic Boulevard

Braamfontein

Johannesburg

Service by Sheriff

AND TO: MUNICIPAL MANAGER

CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY

The Second Respondent

Metropolitan Centre Building

158 Civic Boulevard

Braamfontein

Johannesburg



Service by Sheriff

AND TO: EXECUTIVE MAYOR

CITY OF JOHANNESBURG METROPOLITAN MUNICIPALITY

The Third Respondent

Metropolitan Centre Building

158 Civic Boulevard

Braamfontein

Johannesburg

Service by Sheriff