

**IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION, PRETORIA**

Case No.

In the matters between:

ORGANISATION UNDOING TAX ABUSE NPC

First Applicant

2 028 E-TOLL DEFENDANTS

Second to Two Thousand
and Twenty-Ninth Applicants

and

**SOUTH AFRICAN NATIONAL ROADS AGENCY
SOC LTD**

First Respondent

MINISTER OF TRANSPORT

Second Respondent

MINISTER OF ENVIRONMENTAL AFFAIRS

Third Respondent

**DIRECTOR GENERAL OF ENVIRONMENTAL
AFFAIRS**

Fourth Respondent

MINISTER OF FINANCE

Fifth Respondent

**COMMISSIONER, SOUTH AFRICAN REVENUE
SERVICE**

Sixth Respondent

NOTICE OF MOTION

KINDLY TAKE NOTICE that the above-mentioned applicants intend to make application to this Honourable Court on a date to be determined by the Registrar for an order in the following terms:

1. Declaring that the first respondent has abandoned the actions listed in annexures "**FA2.1**" and "**FA2.2**" to the founding affidavit.
2. Directing the first respondent to pay the costs of the actions referred to in paragraph 1 on party and party scale A, save the actions in the test case proceeded with in this Court in Case No. 22722/16 which shall be paid on party and party scale C, and shall include the costs of three counsel.
3. Authorising the taxing master of the above Honourable Court to tax the costs incurred in the actions.
4. Directing the first respondent, and any further respondents who may oppose the application, to pay the costs on party and party scale B, such costs to include the costs of two counsel.
5. Granting the applicants further and/or alternative relief.

TAKE NOTICE FURTHER that the accompanying affidavit of **STEFANIE FICK**, together with the attachments thereto, will be used in support of this application.

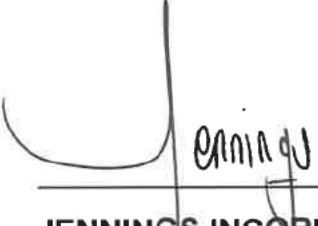
TAKE NOTICE FURTHER that the applicants have appointed the address of their attorneys of record, Jennings Incorporated, situated at 56 Jerome Road, Leopard Court, Ground Floor, Lynnwood Glen, Pretoria, as the address at which they will accept notice and service of all process in these proceedings.

TAKE NOTICE FURTHER that if you intend opposing this application, you are required:

- (a) to notify the applicants' attorneys in writing within 5 days of your intention to oppose and of an address in terms of Rule 6(5)(b); and
- (b) within 15 days after you have given such notice of intention to oppose, to file your answering affidavit, if any.

TAKE NOTICE FURTHER that if no such notice of intention to oppose is given, the application will be heard on a date to be allocated by the Registrar of the abovementioned court at 10h00 or so soon thereafter as counsel may be heard

DATED at Pretoria on this the 14TH day of AUGUST 2025


JENNINGS INCORPORATED
APPLICANT'S ATTORNEYS
56 Jerome Road

Leopard Court

Ground Floor

Lynnwood Glen

Pretoria

Tel: 012 110 4442

E-mail:

[REDACTED]

Ref: A JENNINGS/OUT005

TO: THE REGISTRAR - GAUTENG DIVISION, PRETORIA

AND TO:

SOUTH AFRICAN NATIONAL ROADS AGENCY SOC LIMITED

1ST RESPONDENT

48 Tambotie Avenue

Val de Grace

Pretoria

"SERVICE VIA SHERIFF"

AND TO:

MINISTER OF TRANSPORT

2ND RESPONDENT

c/o the offices of State Attorney

SALU Building

316 Thabo Sehume Street

Pretoria

"SERVICE VIA SHERIFF"

AND TO:

MINISTER OF ENVIRONMENTAL AFFAIRS

3RD RESPONDENT

Environment House

473 Steve Biko

Arcadia

Pretoria

"SERVICE VIA SHERIFF"

AND TO:

DIRECTOR GENERAL OF ENVIRONMENTAL AFFAIRS

4TH RESPONDENT

Environment House

473 Steve Biko

Arcadia

Pretoria

"SERVICE VIA SHERIFF"

AND TO:

MINISTER OF FINANCE

5TH RESPONDENT

40 Church Square

Old Reserve Bank Building

Second Floor

Pretoria

"SERVICE VIA SHERIFF"

AND TO:

COMMISSIONER, SOUTH AFRICAN REVENUE SERVICE

6TH RESPONDENT

271 Bronkhorst Street

Khanyisa Building

Ground Floor

Nieuw Muckleneuk

Pretoria

"SERVICE VIA SHERIFF"