

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

In the matter between:

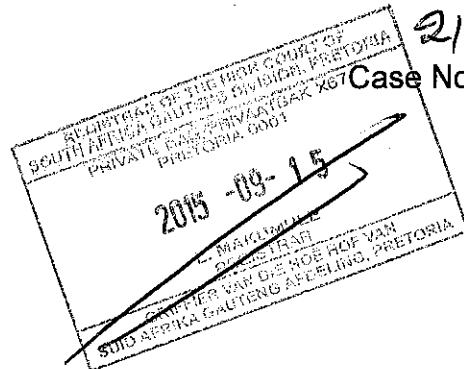
CORRUPTION WATCH (NPC) (RF)

and

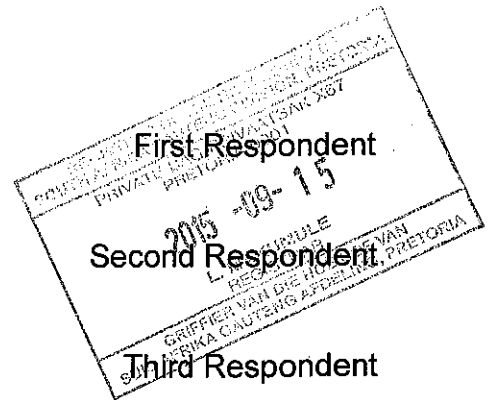
**THE CHIEF EXECUTIVE OFFICER OF THE
SOUTH AFRICAN SOCIAL SECURITY AGENCY**

THE SOUTH AFRICAN SOCIAL SECURITY AGENCY

CASH PAYMASTER SERVICES (PTY) LTD



Applicant



NOTICE OF MOTION

TAKE NOTICE that the above-named applicant intends to make application to this Court on a date to be determined by the Registrar for an order in the following terms:

1. Reviewing and setting aside the first respondent's decision of 25 April 2014 to approve payment by the second respondent of R316 447 361.41 million to the third respondent.
2. Directing the third respondent to repay the aforesaid amount to the second respondent, together with interest thereon.

3. Ordering the first and second respondents, and any other party that opposes this application, to pay applicant's costs, jointly and severally with such costs to include the costs of two counsel.
4. Further and/or alternative relief.

TAKE NOTICE FURTHER that the accompanying affidavits of **DAVID HARRIS LEWIS** and annexures thereto will be used in support hereof.

TAKE NOTICE FURTHER that the first respondent is hereby called upon, in terms of Uniform Rule of Court 53(1)(a), to show cause why the abovementioned decisions should not be reviewed and set aside.

TAKE NOTICE FURTHER that the applicant has appointed the offices of **MACROBERTS** attorneys, at the address set out below at which it will accept service of all process and proceedings.

TAKE NOTICE FURTHER that if any of the respondents intend to oppose the relief sought they are required to:

- (a) within 15 days of this notice of motion or any amendment contemplated in Rule 53(4) of the Uniform Rules of Court to deliver a notice to the applicants' attorneys that the respondents intend to oppose, and in such notice to appoint and address within 8 kilometres of the office of the Registrar of this

Honourable Court at which the respondents will accept notice and service of all process in these proceedings; and

- (b) within 30 days of the expiry of the time referred to in Rule 53(4) of the Uniform Rules of Court, to deliver affidavits, if necessary, in answer to the allegations made by the applicant.

DATED AT JOHANNESBURG ON THIS 11TH OF SEPTEMBER 2015



MACROBERT ATTORNEYS

Per:

MacRobert Building

Corner Charles & Duncan

Streets

Brooklyn

Pretoria

Tel: (012) 425 3400

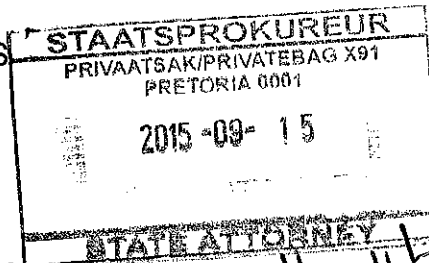
Ref: Mr A Suliman/00001832

TO:

**THE REGISTRAR OF THE ABOVE
HONOURABLE COURT
PRETORIA**

AND TO:

THE STATE ATTORNEY
 1ST & 2ND RESPONDENT'S ATTORNEYS
 GROUND FLOOR, SALU BUILDING
 316 THABO SEHUME &
 FRANCIS BAARD STREETS
 PRETORIA
 TEL: 012 309 1582
 REF: R J RAMNARAIN/2193/2015/Z21/SN



mkoll 11h45
 RECEIVED COPY HEREOF
 ON THIS _____ DAY OF
 SEPTEMBER 2015

AND TO:

SMIT SEWGOOLAM INCORPORATED
 3RD RESPONDENT'S ATTORNEYS
 TEL: 011 646 0006
 REF: MAT21215/OCJ/SC
 c/o **PRETORIUS LE ROUX INCORPORATED**
 339 HILDA STREET
 PRETORIA
 TEL: 012 342 1797
 REF: T LE ROUX/TH0595

PRETORIUS LE ROUX ING/INC
 ONTVANG
 Sonder Benadeling van Regte
 RECEIVED
 Without Prejudice

RECEIVED COPY HEREOF
 ON THIS 15 DAY OF
 SEPTEMBER 2015

T. Le Roux

11.24