IN THE HIGH COURT OF SOUTH AFRICA
(WITWATERSRAND LOCAL DIVISION)

Case Number: 05/16077

In the application of:

THE FREEDOM OF EXPRESSION INSTITUTE	First applicant for admission as an amicus curiae
THE SOUTH AFRICAN NATIONAL EDITORS' FORUM	Second applicant for admission as an amicus curiae
THE SOUTH AFRICAN CHAPTER OF THE MEDIA INSTITUTE OF SOUTHERN AFRICA	Third applicant for admission as an amicus curiae
THE MEDIA WORKERS' ASSOCIATION OF SOUTH AFRICA	Fourth applicant for admission as an amicus curiae

In the matter between:

IMVUME MANAGEMENT (PTY) LIMITED	Applicant

and

M & G MEDIA LIMITED	First Respondent
FERIAL HAFFEJEE	Second Respondent
STEFAANS BRUMMER	Third Respondent

SAM SOLE	Fourth Respondent
WISANI WA KA NGOBENI	Fifth Respondent

NOTICE OF MOTION

TAKE NOTICE that the Freedom of Expression Institute, the South African National Editors' Forum, the South African Chapter of the Media Institute of Southern Africa and the Media Workers' Association of South Africa (hereinafter called "the amicus applicants") intend to apply to this Court for an order:

(a) admitting the First to Fourth Applicants as amici curiae in the above proceedings in terms of Rule 16A of the Rules of this Court

and that the accompanying affidavit of Jane Duncan will be used in support of this application.

TAKE NOTICE FURTHER that the amicus applicants have appointed the offices of Delaney Attorneys, c/o The Freedom of Expression Institute, 21st Floor, Sable Centre, 41 de Korte Street, Braamfontein, Johannesburg 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 to file an answering affidavit within five days of service of this application clearly and succinctly setting out the grounds of opposition.

DATED at JOHANNESBURG this 30th day of September 2005.

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DELANEY ATTORNEYS
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TO:

The Registrar of the High Court
Witwatersrand Local Division

AND TO: **BARRY AARON & ASSOCIATES**
Applicant's Attorneys
Suite 402 West Tower
Nelson Mandela Square
3 Maude Street Sandton
Dx 50 Nelson Mandela Square

P O Box 783125
Sandton, 2146
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Fax 883 8482
Ref: Mr Aaron/1780

Received copy hereof on this
the ____ day of SEPTEMBER 2005

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For: Applicant's Attorneys

AND TO: **WEBBER WENTZEL BOWENS**
Respondents' Attorneys
10 Fricker Road
Illovo Boulevard
Johannesburg 2196
Tel: 530 5200
Fax: 530 6200
Ref: Ms Stein/Ms Dasoo

Received copy hereof on this
the ____ day of SEPTEMBER 2005

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For: Respondents' Attorneys