COURT ONLINE COVER PAGE

IN THE HIGH COURT OF SOUTH AFRICA
Gauteng Division, Pretoria

CASE NO: **2024-148142**

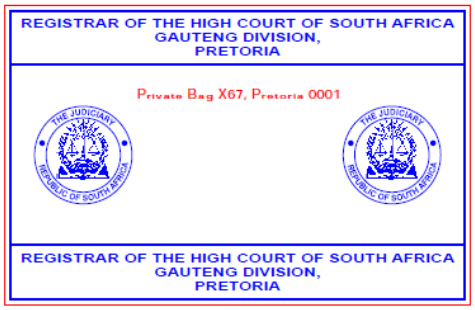
In the matter between:

SAKELIGA NPC	Plaintiff / Applicant / Appellant
and	
PPRA,MINISTER OF HUMAN SETTLEMENTS, WATER AND SANITATION,MINISTER OF TRADE, INDUSTRY AND COMPETITION	Defendant / Respondent

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Replying Affidavit

NOTE: **This document was filed electronically by the Registrar on 9/12/2025 at 9:21:44 AM 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.**



ELECTRONICALLY SIGNED BY:

Registrar of High Court of South Africa , Gauteng Division,Pretoria

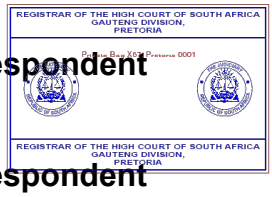
THE HIGH COURT OF SOUTH AFRICA

GAUTENG DIVISION, PRETORIA

Case No: 2024-148142

In the matter between:

SAKELIGA NPC	**Applicant**
and	
PROPERTY PRACTITIONERS REGULATORY AUTHORITY	**First Respondent**
MINISTER OF HUMAN SETTLEMENTS, WATER AND SANITATION	**Second Respondent**
MINISTER OF TRADE, INDUSTRY AND COMPETITION	**Third Respondent**
NATIONAL PROPERTY FORUM	**Fourth Respondent**



FILING NOTICE

DOCUMENTS TO BE FILED:

- **APPLICANT'S FURTHER REPLYING AFFIDAVIT**

DATED AT PRETORIA ON 9 DECEMBER 2025.

KRIEK WASSENAAR & VENTER INC
ATTORNEYS FOR APPLICANT
3RD FLOOR, HB FORUM BUILDING
13 STAMVRUG STREET
VAL DE GRACE

9/12/2025-9:21:44 AM

PRETORIA
TEL: 012 803 4719
E-mail: kayla@kriekprok.co.za
liam@kriekprok.co.za
gideon@kriekprok.co.za
Ref: K DAMES/L ENSLIN/QB1254

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

AND TO: **CHITHA INCORPORATED ATTORNEYS**
ATTORNEYS FOR THE FIRST RESPONDENT
462 Rupert Street,
Brooklyn,
Pretoria
E-Mail: thobile@chithaattorneys.co.za
REF: Chitha/PPRA005/25



SERVICE BY E-MAIL

AND TO: **STATE ATTORNEY: PRETORIA**
ATTORNEYS FOR THE SECOND RESPONDENT
Salu Building,
Francis Baard & Thabo Sehume Street,
Pretoria
E-Mail: LuGumede@justice.gov.za
SThanSithole@justice.gov.za
REF: 0081/2025/Z42/DM

SERVICE BY E-MAIL

AND TO: **STATE ATTORNEY: PRETORIA**
ATTORNEYS FOR THE THIRD RESPONDENT
Salu Building,
Francis Baard & Thabo Sehume Street,
Pretoria
E-Mail: PPillay@thedtic.gov.za
REF: 0491/2025/Z28
ENQ: MS PG PILLAY

SERVICE BY E-MAIL

9/12/2025-9:21:44 AM

AND TO: **KGOBOKOE & COMPANY INC**
ATTORNEYS FOR THE FOURTH RESPONDENT
125 Dallas Avenue, Waterkloof Glen,
Suite 25, 7th Floor,
Menlyn Central Office Building,
Pretoria
E-Mail: reba@kcinc.co.za
holofelang@kcinc.co.za
REF: R KGOBOKOE/HP/LITCON001

SERVICE BY E-MAIL



IN THE HIGH COURT OF SOUTH AFRICA

GAUTENG DIVISION: PRETORIA

Case no: 2024-148142

In the matter between:

SAKELIGA NPC	Applicant
and	
PROPERTY PRACTITIONERS REGULATORY AUTHORITY	First Respondent
MINISTER OF HUMAN SETTLEMENTS, WATER AND SANITATION	Second Respondent
MINISTER OF TRADE, INDUSTRY AND COMPETITION	Third Respondent
NATIONAL PROPERTY FORUM	Fourth Respondent

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

FURTHER REPLYING AFFIDAVIT

I, the undersigned

TOBIAS VIVIAN ALBERTS

make oath and say that:

1. I am the same deponent to the founding affidavit in this matter with full particulars set out therein.

2. The facts deposed to herein fall within my personal knowledge unless otherwise indicated and are true and correct.

3. Where I make submissions of a legal nature, I do so on advice from the applicant's legal representatives.

4. I remain duly authorised to proceed with this application.

5. I have read the answering affidavit of Leo Mlambo on behalf of the National Property Forum ("**NPF**") dated 20 October 2025.



6. Words and phrases defined in the founding affidavit bear the same meaning in this affidavit.

THE ALLEGATIONS CONTAINED IN THE NPF'S ANSWERING AFFIDAVIT

7. I shall now deal *seriatim* with the allegations contained in the NPF's answering affidavit. Insofar as any allegation, conclusion or inference drawn in the NPF's answering affidavit is inconsistent with what is stated in my founding or replying affidavits or this affidavit, such allegation, conclusion or inference is denied, as if specifically traversed.

Ad paragraphs 1 and 2 thereof

8. The content of these paragraphs is admitted.

2

Ad paragraph 3 thereof

9. The content of this paragraph is denied. I deny that the legal advice furnished to the NPF is correct.

AD "CONDONATION FOR LATE FILING"

Ad paragraph 4 thereof



10. The content of this paragraph is admitted.

Ad paragraphs 5 to 13 thereof

11. It is denied that the grounds set out by the NPF in support of condonation constitute valid grounds for the condonation of the late filing of its answering affidavit. The NPF has failed to provide a full and frank explanation for its delay.

12. The applicant sought an order joining the NPF as the fourth respondent together with an order that the NPF's founding affidavit in its intervention application stand as the NPF's answering affidavit in the main application. Yet, the NPF insisted that it wanted to file its own answering affidavit and it was afforded a reasonable opportunity to do so, backed by the undertaking of the NPF's senior counsel that such answering affidavit would be filed on 30 September 2025.

13. On 30 September 2025, the applicant's attorneys ("**KWV**") received an email from the NPF's attorneys ("**Kgobokoe**") indicating that they were in the process of finalising the NPF's answering affidavit and requesting an indulgence until 7 October 2025, by which date they anticipated the answering affidavit would be filed. A copy of Kgobokoe's email dated 30 September 2025 is attached, marked "FRA1".

14. On 6 October 2025, KWV delivered a letter in reply to Kgobokoe referring to the NPF's undertaking to file by 30 September 2025 and requesting that the NPF explain the reasons for its delay and seek condonation from the court. A copy of KWV's letter (which is dated 3 October 2025) is attached, marked "FRA2".

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15. The NPF failed to file its answering affidavit on 7 October 2025.

16. On 13 October 2025, KWV addressed a further letter to Kgobokoe requesting a written undertaking of the date on which the NPF intended to file its answering affidavit. A copy of KWV's letter is attached, marked "FRA3".

17. It was only in response to KWV's letter that Kgobokoe undertook, on behalf of the NPF, that the NPF's answering affidavit would be filed by no later than 20 October 2025. A copy of Kgobokoe's email is attached, marked "FRA4".

18. I attach hereto, marked "**FRA5**" and "**FRA6**", a confirmatory affidavit by Mr Gideon Swart and Mr Liam Enslin of KWV, who confirms the exchange of correspondence set out above.

4

19. The NPF's answering affidavit was duly filed on 20 October 2025.

20. Notwithstanding the above, the NPF filed an answering affidavit which is materially the same as its founding affidavit in the intervention application. It consists solely of legal argument and inadmissible hearsay evidence. The NPF has not advanced any facts or provided any evidence in support of its argument. It has merely aligned itself with the Authority's arguments.



21. Not only is the applicant prejudiced by the unnecessary delay caused by the NPF, the applicant is now compelled to incur the unnecessary cost of filing this further replying affidavit to the NPF's answering affidavit.

22. I submit that the condonation application should be dismissed.

AD "INTRODUCTION"

Ad paragraph 14 thereof

23. The content of this paragraph is admitted.

Ad paragraph 15 thereof

24. Save to deny that the NPF must or can only protect the rights of its members within the regulatory framework of the Property Practitioners Act, the remainder of the content of this paragraph is noted.

5

Ad paragraph 16 thereof

25. The content of this paragraph is denied.

Ad paragraphs 17 and 18 thereof

26. The content of these paragraphs is noted.

AD "STRUCTURE OF THE AFFIDAVIT"

Ad paragraph 19 thereof



27. Save to deny the merit of the arguments advanced by the NPF, the content of these paragraphs is noted.

Ad paragraphs 20 and 21 thereof

28. Save to deny any prejudice on the part of the NPF or its members if the relief sought by the applicant is granted, the remainder of the content of these paragraphs is noted.

AD "DECLARATION OF INVALIDITY OF THE DEFINITION OF PROPERTY PRACTITIONER"

Ad paragraph 22 thereof

29. It is denied that the applicant's challenge to the definition of "property practitioner" in section 1 of the Act is without merit.

Ad paragraphs 23 and 24 thereof

30. The applicant does not take issue with the application of the Act to specific and properly defined actors within the property sector.

31. The applicant's challenge to the definition of "*property practitioner*" is not without merit.



Ad paragraphs 23 to 25 thereof

32. The NPF fails to deal with the nature of the applicant's challenge to the definition of "*property practitioner*" as set out in the applicant's founding affidavit.

33. As explained in the founding affidavit, the Act casts the net too wide and includes persons which the Act never could have intended to regulate. This leads to absurdity.

34. This places an onerous burden on such persons and, in terms of section 62(1)(k) of the Act, read together with section 62(1)(3) thereof, irrationally threatens such persons with the possibility of a fine imposed by the Authority and not a court of law. Worse, section 62(2) of the Act prescribes that the subsequent ratification or correction of conduct that falls short of the Act is not a defence.

7

35. Rather, this challenge seeks to ensure legal certainty thereby encouraging lawful compliance across the property sector.

36. Save as stated above, the content of this paragraph is denied.

Ad paragraphs 26 to 29 thereof

37. The content of these paragraphs is denied.

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GAUTENG DIVISION,
PRETORIA

AD "CONSTITUTIONALITY OF SECTION 50(a)(x) OF THE ACT"

Ad paragraph 30 thereof

38. It is denied that the applicant's contentions are unfounded.

Ad paragraph 31 thereof

39. Save for admitting the historical exclusion of black South Africans from professional participation and property ownership before the reforms of 1986 to 1991, the remainder of the paragraph is denied.

40. That historical context is irrelevant to section 50(a)(x), which improperly purports to function as a probity-based disqualification akin to fraud, insolvency, or tax non-compliance in relation to which the statute evinces no remedial purpose.

41. The assertion that the property sector "remains among the least transformed" is unsubstantiated.

Ad paragraph 32 thereof

42. It is denied that section 50(a)(x) serves an essential and constitutionally legitimate purpose.

43. It is further specifically denied that section 50(a)(x) constitutes a measure envisaged in terms of section 9(2) of the Constitution.

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44. In contrast to the transformation measures in Chapter 4, section 50(a) is structurally limited to probity-based fitness disqualifications aimed at assessing professional suitability. Its scheme does not accommodate section 9(2) equality measures, and on this structural reading, section 50(a)(x) cannot be so characterised.

45. Save as stated above, the content of this paragraph is denied.

Ad paragraph 33 thereof

46. The content of this paragraph is denied.

Ad paragraphs 34 and 35 thereof

47. The content of these paragraphs is denied.

48. The submissions by the NPF are at odds with the clear and express wording of section 50(a)(x) of the Act.

49. The NPF's members who qualify as Exempted Micro Enterprises or Qualifying Small Enterprises are still required to obtain a BEE certificate under section 50.

50. The Authority cannot lawfully accept a sworn affidavit in the place of a BEE certificate as required by the Act and its acceptance of such is *ultra vires* the Act. This only demonstrates that the NPF is mistaken in its interpretation of the Act and its opposition to this application.

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51. The NPF fails to appreciate that the B-BBEE requirement in section 50(a)(x) presents an irrational requirement as:

51.1. it is inherently irrational to compel fledgling businesses and property practitioners to obtain a B-BBEE certificate at great cost and expense for purposes of obtaining a fidelity fund certificate. Such a requirement presents a direct barrier to entry for such businesses;

51.2. As set out in Sakeliga's founding affidavit, the Act, read together with the B-BBEE Act, already addresses the NPF's concerns.

52. Save as stated above, the content of this paragraph is denied.

10

Ad paragraphs 36 to 39 thereof

53. The content of these paragraphs is denied.

AD "REGULATION 2 CHALLENGE"

Ad paragraph 40 thereof

54. The content of this paragraph is admitted.



Ad paragraphs 41 and 42 thereof

55. The content of these paragraphs is denied.

Ad paragraphs 43 to 46 thereof

56. The content of these paragraphs is denied.

57. The NPF fails to appreciate the nature of the applicant's challenge to regulation 2.

Ad paragraph 47 thereof

58. It is denied that the relief sought by the applicant would have harmful consequences for the members of the NPF or the property sector.

59. In fact, the opposite is true and unnecessary barriers to entry will be removed.

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Ad paragraph 48 thereof

60. The content of this paragraph is denied.

Ad paragraph 49 thereof

61. The content of this paragraph is denied.

62. The NPF has provided no evidence in support of its allegations.



Ad paragraph 50 thereof

63. The content of this paragraph is denied. While the applicant agrees that the compliance burden on small and emerging enterprises ought to be eased, regulation 2 does not achieve that end in a lawful manner.

Ad paragraphs 51 and 52 thereof

64. The content of this paragraph is denied.

Ad paragraph 53 thereof

65. It is denied that the NPF is entitled to the relief sought and the applicant persists with the relief sought in the notice of motion.

12

RELIEF SOUGHT

66. In the premises, the applicant persists with the relief sought in the notice of motion.

DEPONENT

THUS SIGNED AND SWORN TO BEFORE ME AT Stellenbosch ON THIS 8th DAY OF DECEMBER 2025, THE DEPONENT HAVING ACKNOWLEDGED THAT HE KNOWS AND UNDERSTANDS THE CONTENTS OF THIS AFFIDAVIT, THAT IT IS BOTH TRUE AND CORRECT TO THE BEST OF HIS KNOWLEDGE AND BELIEF, THAT HE HAS NO OBJECTION TO TAKING THE PRESCRIBED OATH AND THAT THE PRESCRIBED OATH WILL BE BINDING ON HIS CONSCIENCE.

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA GAUTENG DIVISION, PRETORIA

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA GAUTENG DIVISION, PRETORIA

COMMISSIONER OF OATHS
FULL NAMES :
DESIGNATION :
ADDRESS :

COMMISSIONER OF OATHS (RSA)
JAYSON ANDRE VAN ROOYEN
Attorney at Law
Member No.: LPCM61208
STOFBERGS & BEKKER INC.
43 PLEIN STREET, STELLENBOSCH

9/12/2025-9:21:44 AM

FRA1

From: Holofelang | Kgobokoe & Co.
Date: 2025/09/30 20:36:57
To: Gideon Swart; Kayla Dames
CC: Liam Enslin; Yandemi Mouton; thobile@chithatattorneys.co.za; Reba | Kgobokoe & Co.
Subject: Re: : Sakeliga NPC / Property Practitioners Regulatory Authority & Others - Case No: 2024-148142

Attachments:
Size: 131,84 KB

Good day ,

We refer to the above matter.

Kindly note that our answering affidavit was due for filing and service today. However, as we are still in the process of finalising same, we respectfully request your indulgence to extend the period for filing until Tuesday, 7 October 2025. We anticipate being in a position to file and serve the affidavit by that date.

We trust that you will find the above to be in order

Kindest Regards ,

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

Private Bag X67, Pretoria 0001

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

KGOBOKOE
& COMPANY INCORPORATED
Commercial Attorneys

Holofelang Phahlane | Candidate Attorney

Tel : Cell
Address :
Website : www.kcinc.co.za

Attorneys | Business Advisors | Consultants

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From: Gideon Swart <gideon@kriekprok.co.za>
Date: Tuesday, 23 September 2025 at 11:10
To: SBhana@judiciary.org.za <SBhana@judiciary.org.za>
Cc: Liam Enslin <liam@kriekprok.co.za>, Yandemi Mouton <yandemi@kriekprok.co.za>, thobile@chithatattorneys.co.za <thobile@chithatattorneys.co.za>, lugumede@justice.gov.za <lugumede@justice.gov.za>, lugumbede@justice.gov.za <lugumbede@justice.gov.za>, sthansithole@justice.gov.za <sthansithole@justice.gov.za>, Pravani Pillay <ppillay@thedtic.gov.za>, Reba | Kgobokoe & Co. <Reba@kcinc.co.za>, Holofelang | Kgobokoe & Co. <Holofelang@kcinc.co.za>
Subject: : Sakeliga NPC / Property Practitioners Regulatory Authority & Others - Case No: 2024-148142
Good day,

The abovementioned matter refers.

9/12/2025-9:21:44 AM

FRA2

KRIEK WASSENAAR & VENTER INC
PROKUREURS ATTORNEYS

Our ref: Y Mouton/GS/QB1254
Your ref: R Kgobokoe/HP/LITCON001

3 October 2025

KGOBOKOE ATTORNEYS
WATERKLOOF GLEN
PRETORIA

By email: Holofelang@kcinc.co.za
Reba@kcinc.co.za

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

AND TO CC:
CHITHA ATTORNEYS
BROOKLYN
PRETORIA

By email: thobile@chithatattorneys.co.za

Dear Sir/Madam,

RE: SAKELIGA NPC / PROPERTY PRACTIONERS REGULATOR AUTHORITY AND OTHERS
CASE NO: 2024-148142

1. We refer to the abovementioned matter and your e-mail dated 30 September 2025.

2. As you are aware, during the case management meeting held on 17 September 2025, your client undertook to file its answering affidavit on or before 30 September 2025.

3. On the basis of *inter alia* this undertaking, the parties agreed strict time periods for the exchange of affidavits and heads of argument. These dates were noted in the minutes of the case management meeting and encapsulated in a draft order to be made an order of court.

4. In the circumstances, we are unable to consent to a blanket extension until 7 October 2025, as requested. We must insist that your client explain the delay and seek condonation from the court for its late filing. Upon receipt of your client's affidavit setting out the reasons for the

delay, our clients will consider the reasons and decide whether to consent to such an extension or oppose the request for condonation.

5. We trust that you find the above in order.

Yours faithfully,

Pp
KRIEK WASSENAAR & VENTER INC
Gideon Swart
KANDIDAAT PROKUREUR / CANDIDATE ATTORNEY
(t) 012 803 4719
(e) gideon@kriekprok.co.za



9/12/2025-9:21:44 AM

KRIEK WASSENAAR & VENTER ING
PROKUREURS / ATTORNEYS

FRA3

Our ref: Y Mouton/L Enslin/QB1254
Your ref: R Kgobokoe/HP/LITCON001

13 October 2025

KGOBOKOE ATTORNEYS
WATERKLOOF GLEN
PRETORIA

By email: Holofelang@kcinc.co.za
Reba@kcinc.co.za

Sir/Madam

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

RE: SAKELIGA NPC / PROPERTY PRACTIONERS REGULATOR AUTHORITY AND OTHERS
CASE NO: 2024-148142

1. We refer to the abovementioned matter, and our letter dated 3 October 2025, delivered on 6 October 2025.

2. We place on record that your clients have failed and/or refused to file its answering affidavit by 30 September 2025 and have not provided any explanation for this delay. As a result, the securing a hearing date has been delayed, to the prejudice of our client's rights.

3. Taking into account the aforementioned, we request that your clients furnish a written undertaking, by no later than end of business day **13 October 2025**, indicating when your client intends to file its answering affidavit. Failing receipt of the aforesaid undertaking, we will proceed to approach the Honourable Madam Judge Van der Schyff for appropriate relief.

4. We trust that the above is in order and await your urgent response hereto.

Yours faithfully,

Pp
KRIEK WASSENAAR & VENTER INC
Liam Enslin
KANDIDAAT PROKUREUR / CANDIDATE ATTORNEY

From: Holofelang | Kgobokoe & Co.
Date: 2025/10/13 15:33:41
To: Liam Enslin; Reba | Kgobokoe & Co.
CC: Yandemi Mouton; thobile@chithatattorneys.co.za; Kayla Dames; Gideon Swart
Subject: Re: Sakeliga NPC / Property Practitioners Regulatory Authority & Others - Case No: 2024-148142
Attachments:
Size: 195,67 KB

Dear Sirs,

We acknowledge receipt of your letter dated 13 October 2025.

Kindly be advised that our clients will file their answering affidavit by no later than Monday, 20 October 2025.

We trust that you will find the above to be in order.

Kindest Regards ,

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

KGOBOKOE
& COMPANY INCORPORATED
Commercial Attorneys

Holofelang Phahlane | Candidate Attorney

Tel : Cell :
Address :
Website : www.kcinc.co.za

Attorneys | Business Advisors | Consultants

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From: Liam Enslin <liam@kriekprok.co.za>
Date: Monday, 13 October 2025 at 12:18
To: Holofelang | Kgobokoe & Co. <Holofelang@kcinc.co.za>, Reba | Kgobokoe & Co. <Reba@kcinc.co.za>
Cc: Yandemi Mouton <yandemi@kriekprok.co.za>, thobile@chithatattorneys.co.za <thobile@chithatattorneys.co.za>, Kayla Dames <kayla@kriekprok.co.za>, Gideon Swart <gideon@kriekprok.co.za>
Subject: Sakeliga NPC / Property Practitioners Regulatory Authority & Others - Case No: 2024-148142
Good day,

We refer to the abovementioned matter and the correspondence below.

Kindly find attached hereto a letter for your urgent attention.

Kindly acknowledge receipt.

Yours faithfully / Die uwe

LIAM ENSLIN
liam@kriekprok.co.za

Candidate Attorney / Kandidaat-prokureur

Kriek Wassenaar & Venter Inc
2012/030418/21
(+27) 12 803 4719
Third Floor, HB Forum Building,
13 Stamvrug Street, Val de Grace, Pretoria

From: Gideon Swart <gideon@kriekprok.co.za>
Sent: Monday, 06 October 2025 08:02
To: Holofelang | Kgobokoe & Co. <Holofelang@kcinc.co.za>; Reba | Kgobokoe & Co. <Reba@kcinc.co.za>
Cc: Liam Enslin <liam@kriekprok.co.za>; Yandemi Mouton <yandemi@kriekprok.co.za>; thobile@chithatattorneys.co.za; Kayla Dames <kayla@kriekprok.co.za>
Subject: RE: : Sakeliga NPC / Property Practitioners Regulatory Authority & Others - Case No: 2024-148142

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

Good day,

The abovementioned matter and electronic correspondence attached hereto refer.

Kindly find attached a letter for your attention.

Kindly acknowledge receipt hereof.

Yours faithfully,

GIDEON SWART
gideon@kriekprok.co.za

Candidate Attorney / Kandidaat-prokureur

Kriek Wassenaar & Venter Inc
2012/030418/21
(+27) 12 803 4719
Third Floor, HB Forum Building,
13 Stamvrug Street, Val de Grace, Pretoria

From: Holofelang | Kgobokoe & Co. <Holofelang@kcinc.co.za>
Sent: Tuesday, 30 September 2025 20:37
To: Gideon Swart <gideon@kriekprok.co.za>; Kayla Dames <kayla@kriekprok.co.za>
Cc: Liam Enslin <liam@kriekprok.co.za>; Yandemi Mouton <yandemi@kriekprok.co.za>; thobile@chithatattorneys.co.za; Reba | Kgobokoe & Co. <Reba@kcinc.co.za>
Subject: Re: : Sakeliga NPC / Property Practitioners Regulatory Authority & Others - Case No: 2024-148142

Good day ,

We refer to the above matter.

Kindly note that our answering affidavit was due for filing and service today. However, as we are still in the process of finalising same, we respectfully request your indulgence to extend the period for filing until Tuesday, 7 October 2025. We anticipate being in a position to file and serve the affidavit by that date.

We trust that you will find the above to be in order

FRA 5

IN THE HIGH COURT OF SOUTH AFRICA

(GAUTENG DIVISION, PRETORIA)

CASE NO.: 2024-148142

In the application between:

SAKELIGA NPC	**Applicant**
and	
PROPERTY PRACTITIONERS REGULATORY AUTHORITY	**First Respondent**
MINISTER OF HUMAN SETTLEMENTS, WATER AND SANITATION	**Second Respondent**
MINISTER OF TRADE, INDUSTRY AND COMPETITION	**Third Respondent**
NATIONAL PROPERTY FORUM	**Fourth Respondent**

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

CONFIRMATORY AFFIDAVIT

I, the undersigned,

GIDEON JACOBUS JOHANNES SWART

State under oath as follows:

1 I am an adult male candidate attorney at Kriek Wassenaar & Venter Inc. ("KWV"), 3rd Floor, HB Forum Building, 13 Stamvrug Street, Val de Grace, Pretoria.

2 The facts deposed to are within my personal knowledge unless otherwise indicated and are, to the best of my knowledge, both true and correct.

GJJS

3 KWV is the applicant's attorney of record in the abovementioned application in the above Honourable Court.

4 I have read the replying affidavit of **TOBIAS VIVIAN ALBERTS** and confirm the correctness thereof in so far as it relates to me.

GIDEON JACOBUS JOHANNES SWART

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

I hereby certify that the deponent has declared that the deponent understands and knows the contents of this affidavit and that to the best of the deponent's knowledge and belief it is the truth, which affidavit has been signed and sworn to before me at Pretoria on this 9th day of December 2025, and that the provisions of the Regulations contained in Government Notice R 1258 of the 21st July, 1972, (as amended) and Government Notice R1648 on the 18th August 1977 (as amended) have been complied with.

COMMISSIONER OF OATHS

ANRICH MALAN OTTO
Commissioner of Oaths
HB Forum
13 Stamvrug Street
Val De Grace
Ex Officio Practising Attorney
Republic of South Africa

GJJS

FRA 6

IN THE HIGH COURT OF SOUTH AFRICA

(GAUTENG DIVISION, PRETORIA)

CASE NO.: 2024-148142

In the application between:

SAKELIGA NPC	**Applicant**
and	
PROPERTY PRACTITIONERS REGULATORY AUTHORITY	**First Respondent**
MINISTER OF HUMAN SETTLEMENTS, WATER AND SANITATION	**Second Respondent**
MINISTER OF TRADE, INDUSTRY AND COMPETITION	**Third Respondent**
NATIONAL PROPERTY FORUM	**Fourth Respondent**

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA GAUTENG DIVISION, PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA GAUTENG DIVISION, PRETORIA

CONFIRMATORY AFFIDAVIT

I, the undersigned,

LIAM ENSLIN

State under oath as follows:

1 I am an adult male candidate attorney at Kriek Wassenaar & Venter Inc. ("KWV"), 3rd Floor, HB Forum Building, 13 Stamvrug Street, Val de Grace, Pretoria.

2 The facts deposed to are within my personal knowledge unless otherwise indicated and are, to the best of my knowledge, both true and correct.

LE

3 KWV is the applicant's attorney of record in the abovementioned application in the above Honourable Court.

4 I have read the replying affidavit of **TOBIAS VIVIAN ALBERTS** and confirm the correctness thereof in so far as it relates to me.

LIAM ENSLIN

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

I hereby certify that the deponent has declared that the deponent understands and knows the contents of this affidavit and that to the best of the deponent's knowledge and belief it is the truth, which affidavit has been signed and sworn to before me at PRETORIA on this 9th day of DECEMBER 2025, and that the provisions of the Regulations contained in Government Notice R 1258 of the 21st July, 1972, (as amended) and Government Notice R1648 on the 18th August 1977 (as amended) have been complied with.

COMMISSIONER OF OATHS

ANRICH MALAN OTTO
Commissioner of Oaths
HB Forum
13 Stamvrug Street
Val De Grace
Ex Officio Practising Attorney
Republic of South Africa

9/12/2025-9:21:44 AM

From: Liam Enslin
Date: 2025/12/09 09:16:00
To: thobile@chithatattorneys.co.za; LuGumede@justice.gov.za; SThanSithole@justice.gov.za; Pravani Pillay; Reba | Kgobokoe & Co.; Holofelang | Kgobokoe & Co.
CC: Kayla Dames; Gideon Swart
Subject: Sakeliga NPC / Property Practitioners Regulatory Authority & Others - Case No: 2024-148142
Attachments: Filing Notice - Applicants Further Replying Affidavit 2025-12-09.pdf;
Size: 1542,47 KB

Good day,

We refer to the abovementioned matter issued under case number 2024-148142.

Kindly find attached hereto the following document for electronic service:

- Filing Notice: Applicant's Further Replying Affidavit

Kindly acknowledge receipt hereof.

Yours faithfully / Die uwe

LIAM ENSLIN
liam@kriekprok.co.za

REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA
Private Bag X67, Pretoria 0001
REGISTRAR OF THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION,
PRETORIA

Candidate Attorney / Kandidaat-prokureur

Kriek Wassenaar & Venter Inc
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Third Floor, HB Forum Building,
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