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IN THE HIGH COURT OF SOUTH AFRICA
Gauteng Division, Pretoria

CASE NO: **2025-111881**

In the matter between:

Sakeliga NPC,Transvaal Agricultural Union of South Africa,CT van der Merwe Boerdery (Pty) Ltd,Twyfel Nie Plase (Pty) Ltd,Blouberg Sitrus (Pty) Ltd,Pontdrif Citrus (Pty) Ltd,Corfuscore (Pty) Ltd,Mosima Beleggings (Pty) Ltd	Plaintiff / Applicant / Appellant
and	
Minister of Water and Sanitation,Director-General of Water and Sanitation,Department of Water and Sanitation	Defendant / Respondent

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Notice of Motion (Long Form)

NOTE: **This document was filed electronically by the Registrar on 11/7/2025 at 10:45:34 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.**

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

ELECTR SIGNED BY:

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

IN THE HIGH COURT OF SOUTH AFRICA

(GAUTENG DIVISION, PRETORIA)

CASE NO.: _____/2025

In the application between:

SAKELIGA NPC	First Applicant
TRANSVAAL AGRICULTURAL UNION OF SOUTH AFRICA	Second Applicant
CT VAN DER MERWE BOERDERY (PTY) LTD	Third Applicant
TWYFEL NIE PLASE (PTY) LTD	Fourth Applicant
BLOUBERG SITRUS (PTY) LTD	Fifth Applicant
PONTDRIF CITRUS (PTY) LTD	Sixth Applicant
CORFUSCORE (PTY) LTD	Seventh Applicant
MOSIMA BELEGGINGS (PTY) LTD	Eighth Applicant

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

MINISTER OF WATER AND SANITATION	First Respondent
DIRECTOR-GENERAL DEPARTMENT OF WATER AND SANITATION	Second Respondent
DEPARTMENT OF WATER AND SANITATION	Third Respondent

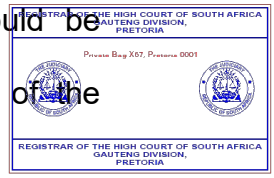
NOTICE OF MOTION

TAKE NOTICE that the above-mentioned Applicants will make application to this Honourable Court on the _____ **2025** at **10h00** for an

order in the following terms:

1 That it is declared that water use charges in terms of the *National Water Act*, 36 of 1998 in respect of water utilized for commercial irrigation and/or other commercial purposes by private individuals or entities is subject to a three year prescription period in terms of Section 11(d) of the *Prescription Act*, 68 of 1969;

2 That it is declared that a three year prescription period would be applicable in respect of the following accounts for water use of the relevant Applicants:



2.1 The Third Applicant – account numbers 100337470 and 100363209;

2.2 The Fourth Applicant – account numbers 100212260, 100336650 and 100338379;

2.3 The Fifth Applicant – account numbers 100341100 and 100113490;

2.4 The Sixth Applicant – account numbers 101196529, 101196511 and 100154438;

2.5 The Seventh Applicant – account numbers 101889668, 101921199 and 101199141;

2.6 The Eighth Applicant - account numbers 100372796, 100372757, 100372838 and 100216878.

3 That the Respondents are ordered to provide to the Applicants' attorneys complete itemized statements, together with all relevant invoices, in respect of all the accounts mentioned in prayer 2 and the sub-prayers thereto, dealing with all amounts claimed to be owed, within 60 (sixty) calendar days from date of this order;

4 That the First to Third Respondents are ordered to pay the costs of this application on Scale C;

5 That further and/or alternative relief be granted.



KINDLY TAKE NOTICE that the accompanying Founding Affidavit of **TOBIAS VIVIAN ALBERTS**, together with annexures and confirmatory affidavits thereto, will be used in support of the application.

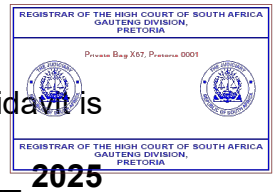
TAKE FURTHER NOTICE that the Applicants have appointed attorneys **KRIEK WASSENAAR & VENTER INCORPORATED**, with address mentioned hereunder, as attorneys and as address at which it will accept all documents, correspondence, notices and pleadings herein.

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

(a) to firstly notify the Applicants' attorneys in writing within 15 (fifteen) days of service of this application upon you; and

(b) secondly within 15 (fifteen) days, after having served notice of intention to oppose the application, to file your Answering Affidavit, if any;

FURTHER TAKE NOTICE that you are required to appoint in such notification an address referred to in Rule 6(5)(b) at which you will accept notice and service of all documents in these proceedings.



If no such notice of intention to oppose be given, or if the answering affidavit is not filed in time, the application will be made on _____ **2025** at **10h00.**

KINDLY SET THE MATTER DOWN FOR HEARING ACCORDINGLY.

SIGNED at **PRETORIA** on **4 JULY 2025**.

KRIEK WASSENAAR & VENTER INC
ATTORNEYS FOR THE APPLICANTS
3rd Floor, HB Forum Building
13 Stamvrug Street, Val De Grace
Pretoria
Tel: 012 803 4719
E-mail: rohann@kriekprok.co.za
liam@kriekprok.co.za
REF: R Eloff/L Enslin/QB1248

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

AND TO: **MINISTER OF WATER AND SANITATION**
FIRST RESPONDENT
185 Francis Baard Street,
Sedibeng Building,
10th Floor, Room 1029,
Pretoria, Gauteng

SERVICE BY SHERIFF



AND TO: **DIRECTOR-GENERAL DEPARTMENT OF WATER AND SANITATION**
SECOND RESPONDENT
Sedibeng Building,
185 Francis Baard Street,
Pretoria, Gauteng

SERVICE BY SHERIFF

AND TO: **DEPARTMENT OF WATER AND SANITATION**
THIRD RESPONDENT
Sedibeng Building,
185 Francis Baard Street,
Pretoria, Gauteng

SERVICE BY SHERIFF

AND TO: **THE STATE ATTORNEY**
316 Thabo Sehume Street,
Pretoria, Gauteng

SERVICE BY SHERIFF