



IN THE HIGH COURT OF SOUTH AFRICA
GAUTENG DIVISION, PRETORIA

Case Number: 2025/137620

(1)	REPORTABLE: YES /NO
(2)	OF INTEREST TO OTHER JUDGES: YES /NO
(3)	REVISED.
	
31 October 2025	
.....	
SIGNATURE	DATE

In the application of:

AFRIFORUM NPC

Applicant

and

NATIONAL ENERGY REGULATOR OF SOUTH AFRICA

1st Respondent

SOUTH AFRICAN LOCAL GOVERNMENT ASSOCIATION

2nd Respondent

ESKOM HOLDINGS SOC LIMITED

3rd Respondent

AMAHLATHI LOCAL MUNICIPALITY

4th Respondent

BLOUBERG LOCAL MUNICIPALITY

5th Respondent

DIHLABENG LOCAL MUNICIPALITY

6th Respondent

DIPALESENG LOCAL MUNICIPALITY

7th Respondent

DITSOBOTLA LOCAL MUNICIPALITY

8th Respondent

eDUMBE LOCAL MUNICIPALITY	9 th Respondent
KAMIESBERG LOCAL MUNICIPALITY	10 th Respondent
MERAFONG CITY LOCAL MUNICIPALITY	11 th Respondent
MOSSEL BAY LOCAL MUNICIPALITY	12 th Respondent
CITY OF EKURHULENI LOCAL MUNICIPALITY	13 th Respondent
CITY OF CAPE TOWN LOCAL MUNICIPALITY	14 th Respondent
192 LOCAL MUNICIPALITIES	15 th – 181 th Respondents

JUDGMENT

LABUSCHAGNE J

THE ORDER:

Having read the papers and having heard counsel

IT IS ORDERED

- [1] That the forms, service and time periods provided for in the Uniform Rules of Court are dispensed with and the application is heard on the basis of urgency in terms of rule 6(12).
- [2] NERSA's implementation of the public participation process of the notice and comment procedure elected by it by, as contemplated in section 4(1) and (3) of the Promotion of Administrative Justice Act, 3 of 2000 ("PAJA") utilised during the consideration and approval of the financial year 2025/2026

municipal tariff applications (“the approvals”) is declared invalid in terms of section 172(1)(a) of the Constitution.

[3] In terms of section 172(1)(b) of the Constitution, and despite the declaration of invalidity set out in paragraph 2 above, the approvals are not set aside.

[4] A rule *nisi* is issued, returnable on 18 November 2025, calling on any respondent to show cause why the following order should not be made:

4.1 NERSA is directed to timeously comply with its obligations as public entity, and as envisaged in section 35(c)(ii) of the Municipal Finance Management Act, to timeously provide information and assistance to municipalities to enable municipalities to prepare their budgets in accordance with the processes set out in Chapter 4 of the MFMA. In pursuance of the aforesaid, the following directions are issued:

4.1.1 By 31 January of every year, NERSA must give municipal licensees written notice of bulk of wholesale tariffs at which municipal licensees shall purchase electricity from Eskom, or any other licensed generator, for the next financial year;

4.1.2 The notice referred to above shall in addition require municipal licensees to submit their electricity tariff applications by no later than 30 March of every year, failing which they run the risk of no tariff increase being approved;

- 4.1.3 NERSA is directed to comply with the provisions of section 4 of PAJA, and the regulations published in terms thereof, in respect of whichever procedure for public participation it chooses, in terms of section 4 of PAJA, for considering and approving municipal electricity tariff applications;
- 4.1.4 For purposes of meaningful public participation, NERSA is directed to publish every municipal electricity tariff application along with its cost of supply study for that particular financial year, in a manner that makes it accessible to the public, provided that, where a municipal electricity tariff application does not include a cost of supply study for the financial year, NERSA must specifically state the absence of such costs of supply study;
- 4.1.5 NERSA is directed to finalise the process of considering the municipal electricity tariff applications timeously received and communicate its decisions on or before 05 May of every year;
- 4.1.6 NERSA must simultaneously also publish all of the respective decisions it reached on the municipal electricity tariff applications received; and
- 4.1.7 NERSA may not unilaterally extend or deviate from the aforesaid timeframes for applications timeously received without good cause and, if established, with prior notice to the parties affected.

4.2 Every municipality that submits an electricity tariff application must take all reasonable steps to ensure that the public participation process NERSA chooses regarding municipal tariff applications is brought to the attention of the public within its jurisdiction.

[5] AfriForum shall forthwith cause this order to be served:

5.1 On all participating respondents' attorneys of record, where such attorneys have been appointed, by email;

5.2 On the Chief Executive Officer of Eskom, by the sheriff; and

5.3 On the municipalities in **Annexure FA2** to the notice of motion, other than those in paragraph 5.1 above, by email sent to the municipal managers.

[6] NERSA is ordered to pay the costs of the application, including the costs consequent upon the employment of two advocates, on Scale C, where so employed

REASONS

[1] This matter served as a special allocation, having commenced in the urgent court during October 2025. Due to the length of the papers the matter could not be heard in the week of 14 October 2025 and was placed for hearing on 28 October 2025.

[2] AfriForum applied on the basis of urgency for an order on the following terms:

- “1. *Dispensing with the forms and service provided for in the rules and hearing the application as a matter of urgency.*
2. *That the first respondent’s public participation process in the form of a notice and comment procedure as contemplated in section 4(1) and (3) of the Promotion of Administrative Justice Act 3 of 2000, which process was utilised during the consideration and of the FY2025/2026 Municipal Tariff applications, be declared invalid.*
3. *That the retrospective effect of the declaration of invalidity in paragraph 2 above be suspended.*
4. *That the first respondent is interdicted and restrained as follows:*

 - 4.1 *The first respondent must publish the notice calling for municipalities to submit their electricity tariff applications by no later than 10 November every year;*
 - 4.2 *The above notice must require municipalities to submit their electricity tariff applications by no later than 15 January each year;*
 - 4.3 *The first respondent must comply with the provisions of the Promotion of Administrative Justice Act 3 of 2000 and the regulations published under the Act, in whichever procedure for public participation it chooses for consideration and approving municipal electricity tariff applications;*

- 4.4 *The first respondent must publish every electricity tariff application along with its costs of supply study, whether new or existing, in a manner that makes it accessible to the public for the purpose of public participation;*
 - 4.4.1 *The first respondent must specify, whenever municipal electricity tariff applications are published for public review, where an application does not include the cost of supply/study;*
- 4.5 *That the first respondent must finalise the process of considering the municipal electricity tariff application received and reach a decision on or before 30 March every year;*
- 4.6 *The first respondent must publish all of the respective decisions it reached on the municipal electricity tariff applications received;*
- 4.7 *The first respondent may not extend or deviate from the aforementioned timeframes unilaterally, without prior notice and without good cause being shown.*
- 5. *Every municipality that submits an electricity tariff application must take all reasonable steps to ensure that the public participation process the first respondent chooses regarding municipal electricity tariff applications is brought to the attention of the public within its jurisdiction.*

6. *In the alternative to paragraphs 4 and 5 above, and in the event that the honourable court does not deem the interdict to be just and equitable, it be declared that the Constitution requires the public participation process embarked upon for the consideration and approval of municipal electricity tariff applications to be procedurally rational, which requires the first respondent to meet the following minimum criteria:*

6.1 *The first respondent is to publish the notice calling for municipalities to submit their electricity tariff applications by no later than 10 November every year;*

6.2 *The above notice is to require municipalities to submit their electricity tariff applications by no later than 15 January each year;*

6.3 *The first respondent is to comply with the provisions of the Promotion of Administrative Justice Act 3 of 2000 and the regulations published under the Act, in whichever procedure for public participation it chooses for considering and approving municipal electricity tariff applications;*

6.4 *The first respondent is to publish every electricity tariff application along with its costs of supply/study, whether new or existing, in a manner that makes it accessible to the public for the purpose of public participation;*

- 6.4.1 *The first respondent is to specify, whenever municipal electricity tariff applications are published for public review, where an application does not include a cost of supply/study;*
- 6.5 *That the first respondent is to finalise the process of considering the municipal electricity tariff application received and reach a decision on or before 30 March every year;*
- 6.6 *The first respondent is to publish all of the respective decisions it reached on the municipal electricity tariff applications received;*
- 6.7 *The first respondent may not extend or deviate from the aforementioned timeframes unilaterally without prior notice and without good cause being shown.*
- 7. *That it be declared that section 152 of the Constitution requires that every municipality that submits an electricity tariff application is to take all reasonable steps to ensure that the public participation process the first respondent chooses regarding municipal electricity tariff applications is brought to the attention of the public within its jurisdiction.*
- 8. *That the first respondent be ordered to pay the costs of the application, including the costs of two counsel, and in the event that any of the other respondents unsuccessfully opposing the application, that such respondents and the first respondent be ordered to pay the costs of*

the application, including the costs of two counsel, jointly and severally, the one paying the other to be absolved.

9. *Such further or alternative relief as the court may grant.”*

- [3] The application was opposed by the first respondent (NERSA). It was also initially opposed by the City of Ekurhuleni, Mogale City and the City of Johannesburg. The City of Cape Town merely challenges the dates suggested in paragraphs 2 and 4 of the notice of motion referred to above.
- [4] SALGA initially also opposed but indicated that its primary concern lies in the date referred to in paragraph 4.1 of the notice of motion (i.e. 10 November of every year).
- [5] The City of Cape Town suggests that the date in paragraph 4.2 of the notice of motion (15 January of each year) is too early and that this date should be moved to 20 March.
- [6] The City of Cape Town further suggests that a further milestone be inserted in the suggested timeline, i.e. that NERSA must determine the electricity tariff for bulk sales by Eskom to its customers by the end of January of every year.
- [7] In the course of argument AfriForum accepted the comments and suggestions of those municipalities that intended opposing. This resulted in an amended time frame being mooted. However, as the respondents were brought to court on the initial notice of motion and have not participated, or have abided, a rule nisi was suggested.

- [8] The applicant and the City of Cape Town lament the consistent lateness of NERSA in determining and publishing the tariff for bulk sales of electricity by Eskom to its customers and the late response to municipalities' applications to NERSA for approval of their municipal tariffs. The latter applications depend on the tariff determination of bulk sales by ESKOM as the municipal tariff consists of a NERSA approved mark up on the ESKOM tariff.
- [9] The dilemma is that the financial year of every municipality commences on 1 July of every year and by 1 July every municipality must adopt a budget. The draft budget needs to be published at least 90 days before 1 July. As the sale to end users of electricity is one of the pillars of municipal revenue, the need for clarity on the Eskom bulk tariff and NERSA's response to municipal tariff applications, points to a timeframe within which NERSA must act so that municipalities can lawfully adopt budgets.
- [10] As it is a statutory requirement that municipalities may only charge an approved tariff, the timing of NERSA's approvals is vital.
- [11] The consistent lateness of NERSA's responses has adversely affected the public's right to participate in the finalisation of firstly budgets, and secondly municipal electricity tariffs as an anchor component of budgeting for municipal revenue.
- [12] NERSA adopted a notice and comment procedure in terms of section 4(1) and 4(3) of PAJA. That decision is not reviewable in terms of PAJA and is not challenged. The applicant however contends that the implementation of that notice and comment procedure is constitutionally invalid because of the

consistent lateness and inadequacy of NERSA's notifications on the applications for approval of municipal tariffs for electricity sales.

- [13] The time within which the public could comment was reduced to such an extent that in certain instances there was no participation at all. There are a number of instances. One will suffice. In the case of Mogale City, its application was published on 19 June 2025, and NERSA took a decision approving the tariff the next day. There was no public participation as none was possible.
- [14] Further, NERSA has adopted the position that the cost of sale studies that accompany the tariff applications are confidential, and they were not published so that the public could comment. Further, contrary to Regulation 18 of the PAJA Regulations, NERSA does not publish its notices in the Government Gazette and two newspapers, and in more than one official language. It merely publishes on the NERSA website and social media, citing the other methods prescribed as outdated.
- [15] The application is opposed by NERSA, who contends that it sets deadlines for municipalities by which dates applications for approval of municipal electricity tariffs need to be submitted to NERSA for approval. However, the bulk of municipalities are not adhering to the deadlines and this in turn delays NERSA's decisions.
- [16] NERSA contends that it is forced to deviate from the prescribed public participation processes envisaged by section 4 of PAJA and the PAJA

regulations due to circumstances forced upon it by tardy municipalities. As PAJA permits deviations, NERSA denies any wrongdoing.

- [17] NERSA contends that the relief sought is not urgent, that it has substantially complied with its obligations and that the relief sought will cause judicial overreach. It asserts its status as a specialist regulator to which the court should show deference in determining its own timetable. This defence was raised by the City of Ekurhuleni and the City of Johannesburg as well, but was not advanced in argument

THE REGULATORY FRAMEWORK

- [18] An electricity tariff is determined in terms of section 15(1) of the Electricity Regulation Act, 4 of 2006 and consists of a cost of supply by an efficient licensee together with a reasonable return. This section determines the ESKOM application for its annual allowable revenue, which in turn determines the ESKOM tariff. It is also the basis for a municipal tariff application which likewise consists of cost of supply study and a reasonable mark-up.
- [19] The NERSA process of approving tariffs runs in tandem with the process of approving municipal budgets. Both processes require public participation. The regulatory framework envisages cooperative governance by municipalities and NERSA in respect of public participation in the process of approval of budgets and municipal electricity tariffs. Administrative tardiness has muddled the alignment that is required to ensure the lawful adoption of municipal budgets.

- [20] Central to this matter is section 35 of the Municipal Finance Management Act (MFMA) which reads in part:

“Promotion of co-operative government by national and provincial institutions

35. National and provincial departments and public entities must –

...

(c) provide timely information and assistance to municipalities to enable municipalities –

(i) ...

(ii) to prepare their budgets in accordance with the processes set out in Chapter 4 of this Act.”

- [21] The Council of a municipality must for each financial year approve an annual budget before the start of the financial year (section 16(1) of the MFMA). The mayor of the municipality must table the annual budget at a Council meeting at least 90 days before the start of the budget year (section 16(2) of the MFMA).

- [22] The budget therefore needs to be approved by Council no later than 30 June as the financial year commences on 1 July.

[23] A municipality's electricity tariffs are an essential component of the municipal budget. As the electricity tariffs have to be approved by NERSA, such approval must be timeous and the information pertaining to it is to be provided within a timeframe that permits the municipality to adopt a budget before 1 July.

[24] Section 15(1) of the ERA stipulates that NERSA's setting of tariffs:

“(a) must enable an efficient licensee to recover the full cost of its licensed activities, including a reasonable margin or return.”

[25] This has become known as the cost of supply methodology.

[26] Municipalities are precluded from charging any tariff for electricity other than that determined or approved by NERSA (section 15(2)).

[27] The national government had formulated its Electricity Pricing Policy (EPP) in Government Notice 1398 of 19 December 2008. The document reflects a number of policy positions of which Policy Position 2 and Policy Position 23 are relevant. Policy Position 2 provides that:

“(a) Electricity tariffs must reflect the efficient cost of rendering electricity services as accurately as practical;

(b) The average level of all the tariffs must be set to recover the approved revenue requirements; and that

(c) The tariff structures must be set to recover the costs as follows:

- (i) *The energy cost for a particular customer category;*
- (ii) *The network usage cost for a particular customer category; and*
- (iii) *Service costs associated therewith.”*

[28] Policy Position 23 requires electricity distributors to undertake the cost of supply study every five years.

[29] NERSA for a number of years employed a benchmarking methodology where a specific year's tariff was merely adjusted by a markup, rather than with reference to a cost of supply study. In **Nelson Mandela Bay Business Chambers NPC and Another v National Energy Regulator and Others** (63393/2021) [2022] ZAGPPHC 778 (20 October 2022), Kubushi J put an end to the benchmarking process and directed that cost of supply methodology had to be followed as required by section 15(1)(a) of the ERA and the EPP.

[30] NERSA has also formulated the cost of supply framework as well as a How To guide.

[31] As far as public participation is concerned, section 4(1) of PAJA deals with administrative action that materially and adversely affects the rights of the public. In such an instance the administrator may decide to either hold public enquiries or a notice and comment procedure may be followed, or a combination of both (section 4(1)(a), (b) and (c)).

[32] Section 4(3) of PAJA determines that where an administrator decides to follow a notice and comment procedure, as in this instance, the administrator must:

- 32.1 Take appropriate steps to communicate the administrative action to those likely to be materially and adversely affected by it and call for comments from them.
- 32.2 Consider any comments received.
- 32.3 Decide whether or not to take the administrative action, with or without changes; and
- 32.4 Comply with the procedures to be followed in connection with notice and comment procedures, as prescribed.

[33] The regulations issued in terms of PAJA require the following:

- 33.1 The information concerning the proposed administrative action must be published by way of notice in the Government Gazette and a newspaper or newspapers which collectively are distributed throughout the Republic. This relates to administrative action that affects the rights of the public throughout the Republic, as in this instance (regulation 18(1)(a)).
- 33.2 Regulation 18(2) acquires the notice to include an invitation to members of the public to submit comments with regard to the proposed administrative action within a date not earlier than 30 days from the date of publication of the notice (regulation 18(2)(a)).
- 33.3 The notice published in terms of regulation 18(1) must contain sufficient information about the proposed administrative action to

enable members of the public to submit meaningful comment (regulation 18(3)(a)).

33.4 The notice must be published in at least two official languages and must take into account the language preference or usage in the province or area concerned (regulation 19).

[34] AfriForum contends that the public participation process for 2025 is defective and constitutionally invalid. The reasons include that:

34.1 Cost of supply studies did not accompany notices to the public, thereby depriving them from an opportunity of making meaningful comments.

34.2 Insufficient notice was given.

34.3 The notices were not published in newspapers, but on NERSA's website and were not published in at least two official languages.

URGENCY

[35] The applicant's case for urgency is that it cannot obtain effective redress in the normal course as the issues it raises cannot be brought to court in time before a new financial year commences, rendering the relief it seeks moot. NERSA contends that the urgency is self-created due to a gap in the period between the AfriForum letter of demand of 27 June 2026 and launching the application seven weeks later.

[36] The facts demonstrate that NERSA was in respect of certain municipalities still in the process of approving their tariff applications at that time. Some approvals were only communicated after the new financial year had commenced on 1 July. While an applicant in an urgent application must explain any delay in launching its urgent application, this matter shows that the facts were still emerging. The matter is complex, and it involves every municipality in the country. In allowing time for respondents to respond, generous time frames were permitted as the urgency dictated such an approach.

[37] Taking the aforesaid into account I am satisfied that the application is urgent as the applicant will not obtain substantial redress in due course.

COST OF SUPPLY STUDIES

[38] The position adopted by NERSA regarding the confidentiality of cost of supply studies needs to be assessed. A tariff application and the decision on it comprises two parts- the cost of supply and a reasonable return. The cost of supply is in respect of an efficient licensee. This is a topic on which the public have a right to be heard.

[39] The purpose of a cost of supply study is to demonstrate efficiency as licensee. And secondly it serves the purpose of transparency- i.e. being open to scrutiny. In **AfriForum NPC v NERSA [2024] ZAGPPHC 638 (8 July 2024)** the following is said at par [7] per De Vos AJ:

“The cost of supply study serves a dual function. The first is to ensure that municipalities efficiently distribute electricity. If municipalities are charging more than the cost of supply study indicates is necessary, they are not providing services efficiently. Municipalities' licenses are subject to them being efficient licensees. A cost of supply study allows NERSA to test the efficiency of the municipality's electricity distribution. The second is to ensure a standardised and transparent process that end-users can engage with. These twin principles of efficiency and transparency underpin the requirement of a cost of supply study.”

[40] The history of local government has demonstrated public anger and protest, sometimes violent, regarding poor service delivery in many parts of the country. There is understandable public interest, if not apprehension, about efficient use of public resources. When a municipality applies to NERSA for a tariff approval it must include a cost of supply study as the basis for its case for a reasonable return. The municipality can have no expectation of confidentiality in respect an official document indicating how it intends spending public funds in supplying an electricity service to rate payers. The cost of supply study is a public document intended for public and official scrutiny. This is demonstrated by the fact that none of the municipalities has contended that their cost of supply studies are confidential and should be kept away from the public.

[41] How NERSA could unilaterally declare a cost of supply study as confidential is beyond concerning. It did not publish this policy in advance. It is a public

watchdog that has, due to this private policy, kept the public in the dark about matters that directly concern the public.

- [42] NERSA is a specialist public entity to which judicial deference is owed in determining tariffs. But it is also duty bound to act in accordance with the law. The inadequacy of notice to the public in respect of tariff applications, by not including the cost of sales studies, is self-evident. The impression created is that NERSA has become so adept that it does not require, or value, public participation in respect of cost of sales studies. This would be contrary to the law, as section 4 of PAJA requires the comments by the public to be taken into consideration.

SUBSTANTIAL COMPLIANCE

- [43] The PAJA Regulations are binding on NERSA. NERSA's decisions need to be communicated in the prescribed manner. Regulation 18 prescribes a 30 day period for public comment. It requires publication in the Government Gazette and two newspapers in more than one official language.
- [44] NERSA has unilaterally and as a policy decided not to comply with the PAJA regulation 18. It has resorted to self-help, no doubt well intended, but contrary to the law. To contend that there was substantial compliance because notice was given, is an argument that cannot be countenanced where a deliberate decision not to adhere to the law lies at the root (see **Firststrand Bank Ltd v Briedenhan 2022 (5) SA 215 (EC) at [52]**).

- [45] Where modernisation is the reason for non-compliance, a change in the regulations is a matter for the legislature to consider (*Ibid.* par [54]). Where a lawful deviation can be motivated as permissible policy, an application to the court to sanction such conduct is a minimum legality requirement for a regulator enforcing licence conditions on licensees. It is not a law unto itself but is empowered to regulate in terms of empowering provisions.
- [46] In light of the manifold deficiencies in the implementation of the notice and comment procedure for the FY2025/2026 it cannot pass constitutional muster and must be declared invalid in terms of section 172(1)(a).

JUST AND EQUITABLE REMEDY

- [47] The court has a wide discretion in respect of a just and equitable remedy in terms of section 172(1)(b) of the Constitution. AfriForum in its notice of motion seeks an order suspending the declaration of invalidity to preserve the status quo. However, it is not clear for how long the suspension would be in place and pending what. The uncertainty regarding the import of the declaration of invalidity could trigger consequences that an intended holding pattern, preserving the status quo, was meant to avoid.
- [48] The determination of a corrective remedy is a multi-layered enquiry in which the public interest is a primary consideration. In **All Pay Investment Holdings (Pty)(Ltd) v CEO, SASSA 2014 (4) SA 179 (CC)** the following was stated in the context of pensions:

“[32] This corrective principle operates at different levels. First, it must be applied to correct the wrongs that led to the declaration of invalidity in the particular case. This must be done by having due regard to the constitutional principles governing public procurement, as well as the more specific purposes of the Agency Act. Second, in the context of public-procurement matters generally, priority should be given to the public good. This means that the public interest must be assessed not only in relation to the immediate consequences of invalidity — in this case the setting-aside of the contract between SASSA and Cash Paymaster — but also in relation to the effect of the order on future procurement and social-security matters.

[33] The primacy of the public interest in procurement and social-security matters must also be taken into account when the rights, responsibilities and obligations of all affected persons are assessed. This means that the enquiry cannot be one-dimensional. It must have a broader range.”

[49] The approval of a municipal budget, based on an approved electricity tariff, has knock on effects. Third parties, like financiers, take financial decisions based on the approved budget and regulate their affairs accordingly. It is therefore important not to destabilise municipal revenue and to cause uncertainty in the financial markets. I therefore find it more appropriate not to set aside NERSA approvals of tariffs, despite the declaration of invalidity.

CONCLUSION

[50] Meaningful public participation, as required by the process in section 4 of PAJA was fundamentally undermined by late notifications, inadequate information and non-compliance with regulation 18 of the PAJA Regulations. NERSA's implementation of its notice and comment procedure in terms of section 4 of PAJA is therefore constitutionally invalid.

[51] However, despite the declaration of invalidity, the NERSA approvals of municipal tariffs are not set aside.

[52] In the premises the order set out above is issued.

 

LABUSCHAGNE J

JUDGE OF THE HIGH COURT

DATE OF HEARING : 28 OCTOBER 2025

DATE JUDGEMENT DELIVERED : 31 OCTOBER 2025

APPEARANCES:

**COUNSEL FOR APPLICANT: ADV BOTHA SC
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