

Date: 16 September 2024

TO: **The Honourable Acting Judge
President, Goliath** Your ref: 5676/2024
Per hand delivery

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Total pages: 3 Our ref: T057-003

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Dear Acting Judge President Goliath,

**RE: THE GREEN CONNECTION AND ANOTHER // MINISTET OF FORESTRY, FISHERIES & THE
ENVIRONMENT AND OTHERS**

[WESTERN CAPE DIVISION, CAPE TOWN - CASE NO: 5676/2024]

Expertise grounded in experience

Cullinan & Associates Incorporated (2001/001024/21)

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1. We refer to the above matter and confirm that we act for the applicants. This letter is addressed to you with the approval of all of the parties cited in the application.
2. The parties in this matter are:
 - 2.1. The Green Connection NPC (first applicant);
 - 2.2. Natural Justice (second applicant);
 - 2.3. The Minister of Forestry, Fisheries and the Environment (first respondent);
 - 2.4. The Minister of Mineral Resources and Energy (second respondent);
 - 2.5. The Director General: Department of Mineral Resources Energy (third respondent);
and
 - 2.6. Total Energies EP South Africa Block 567 (Pty) Ltd (fourth respondent).
3. The application was issued on 20 March 2024 and served on the respondents on various dates during April and May 2024. The relief sought is for the review and setting aside of decisions by the first and third respondents in terms of the National Environmental Management Act. The decisions relate to oil exploration activities which the fourth respondent intends to conduct offshore the west coast of South Africa.
4. The pleadings delivered to date are the notice of motion, founding affidavit and annexures, consisting of 1614 pages.
5. Those state respondents whose decisions form the subject-matter of the review application made the record of decision available on 13 August 2024, consisting of 10 313 pages.
6. We are of the view that the matter will require a special allocation, and should furthermore be subject to case management to ensure its orderly progression.
7. In the circumstances, we respectfully request that this matter be dealt with by way of a special allocation (as the Acting Judge President may deem fit) and case management such that a timetable may be set for the further exchange of pleadings.
8. To this end, the parties met on 10 September 2024, with a view to establishing a mutually agreeable timetable. The parties agreed the following dates on the procedural steps to be taken in this matter, which is subject to the honourable court's approval and directions:

- 8.1. applicants to file the supplementary founding affidavit on **10 October 2024**;
 - 8.2. respondents to file their answering affidavits on **10 December 2024**;
 - 8.3. applicants to file the replying affidavit on **29 January 2025**;
 - 8.4. applicants to file heads of argument (including practice note & list of authorities) on **28 February 2025**;
 - 8.5. respondents to file heads of argument (including practice note & list of authorities) on **28 March 2025**; and
 - 8.6. the hearing to be held the week of **5 May 2025**.
9. We suggest that a meeting with the Acting Judge President or the judge appointed to case manage the application would be of assistance in progressing the matter. The parties' legal representatives will make themselves available at the convenience of the Court or the Acting Judge President for the proposed meeting. We would proposed that a virtual meeting would be the most efficient.
10. We are grateful for your consideration of this matter.

Yours sincerely,

Lesai Seema

CULLINAN & ASSOCIATES INC.

Per: Lesai Seema