

**IN THE HIGH COURT OF SOUTH AFRICA**

**[INSERT RELEVANT DIVISION OF HIGH COURT AND CITY]**

CASE NUMBER: **[Insert case number]**

In the matter between

**[INSERT NAME OF PLAINTIFF]**

**PLAINTIFF/APPLICANT**

and

**[INSERT NAME OF DEFENDANT]**

**DEFENDANT/RESPONDENT**

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**RESPONDENT'S HEADS OF ARGUMENT**

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1.

**INTRODUCTION**

2.

***POINT IN LIMINE***

3.

**URGENCY**

3.1 The application has been brought on the basis of urgency in that the normal rules regarding time periods and service have not been complied with and the matter set down for hearing in the urgent court.

**THE MERITS**

4.

**Background**

4.1 Facts that are common cause:

4.1.1

4.1.2

4.1.3

4.2 Factual allegations by the Respondent that are in issue:

4.2.1

4.2.2

4.2.3

5.

## **LEGAL ARGUMENT**

6.

The Respondent prays that the application be dismissed with costs.

DATED AT \_\_\_\_\_ ON THIS \_\_\_\_\_ DAY OF  
\_\_\_\_\_ 201\_\_\_\_.

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**COUNSEL FOR THE RESPONDENT**