



Labour Appeal Court
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Date: 08 July 2022

TO: PURDON & MUNSAMY ATTORNEYS

REF: KRM/ED/A006/0393

Email: rama@purdon.co.za

AND TO: FUTYCHER AND POPPESQUE ATTORNEYS

REF: M FUTCHER

Email: adrian@fpattorneysinc.co.za /admin@fpattorneysinc.co.za

Dear Sirs

**RE: SOUTH AFRICAN CLOTHING AND TEXTILE WORKERS UNION vs. BARGAINING
COUNCIL FOR THE FURNITURE MANUFACTURING INDUSTRY, KWAZULU-NATAL
& OTHERS-CASE N.O.: DA9/22**

1. By the direction of the Judge President of the Labour Appeal Court, the parties in the above appeal are required to deliver their Heads of Arguments as directed below:
 - (a) The appellant is required to deliver to the Registrar and the respondents or their representative (s) its heads of argument on or before **08 August 2022.**
 - (b) The respondents are required to deliver to the Registrar and the appellant or its representative(s) their heads of argument on or before **02 September 2022.**

2. The parties' attention is specifically drawn to the provisions of Rule 9 of the Labour Appeal Court, which specify certain requirements which heads of argument must comply with, in particular, the parties are urged to:
 - (a) Ensure that their heads of argument include a chronology of events that are relevant for the determination of the appeal or cross-appeal.
 - (b) List those facts which are common cause and are relevant for the determination of the appeal or cross-appeal.
 - (c) Indicate the findings of fact, law or conclusions based on value judgements, if any, made or reached by the Court *a quo* which it is intended should be overturned
 - (d) Indicate the conclusion of law or findings of fact or conclusions based on value judgement, if any, which the Court *a quo* did not reach but which the Labour Appeal Court will be asked to reach.

3. **PRACTICE DIRECTION:**

Kindly take notice that the Judge President of the Labour Appeal Court directs that the parties in the above matter deliver a practice note of not more than 10 (ten) pages, together with their heads of argument indicating briefly the following:

- (a) the nature of the Appeal.
- (b) issues in the Appeal.
- (c) an estimate of the duration of argument;
- (d) which portions or pages of the record are in a language other than English.
- (e) a list reflecting those parts of the record that, in the opinion of counsel, are necessary for the determination of the Appeal.
- (f) a summary of the appellant and respondent's argument (ideally not exceeding two folios);
- (g) an indication of those authorities to which particular reference will be made during the course of argument

NB: The parties are urged not to fax, or e-mail heads of argument and practice note as the parties are required to file an original plus three copies with the Registrar of the Labour Appeal Court.

Your faithfully

A small, rectangular image showing a handwritten signature in dark ink on a light-colored background. The signature is somewhat stylized and appears to be the name 'C. T. Phophi'.

C. T. Phophi

Registrar: Labour Appeal Court of South Africa