

**BEFORE THE DECISION MAKING COMMITTEE  
AT WELLINGTON**

**IN THE MATTER** of the Exclusive Economic Zone and Continental Shelf  
(Environmental Effects) Act 2012

**AND**

**IN THE MATTER** of the Trans-Tasman Resources Limited iron sand  
extraction and processing application

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**MEMORANDUM OF COUNSEL ON BEHALF OF TE OHU KAI MOANA  
TRUSTEE LIMITED**

**20 JANUARY 2017**

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**KAHUI**  
LEGAL

Solicitors

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Counsel: H K Irwin-Easthope

**WELLINGTON**

**MAY IT PLEASE THE DECISION MAKING COMMITTEE:**

1. This memorandum of counsel is filed on behalf of Te Ohu Kai Moana Trustee Limited (**Te Ohu**) in relation to the filing deadline of 12pm, 24 January 2017 for all submitter evidence in the context of the Trans-Tasman Resources Limited (**TTR**) iron sand extraction and processing application (the **Application**). Te Ohu is a submitter on TTR's Application.
2. As confirmed to the Environmental Protection Authority on Monday 16 January 2017, Te Ohu intends to file evidence of Ms Kirsty Woods. There was a bereavement in Ms Woods' close family in the final weeks of December 2016 and Ms Woods has not been in a position to attend to her evidence as originally planned over the Christmas and New Year period.
3. Te Ohu is still working towards filing material by the 12pm, Tuesday 24 January 2017 deadline but, in the event that it is unable to, Te Ohu respectfully requests an extension to file its evidence by **5pm, Thursday 26 January 2017**. Counsel submits that such an extension would not be prejudicial to any party and is necessary to ensure Te Ohu can appropriately consider, and if necessary respond to, the relevant TTR evidence filed on 19 December 2016.

**DATED this 20<sup>th</sup> January 2017**



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**H K Irwin-Easthope**  
For Te Ohu Kai Moana Trustee Limited