

[REDACTED]

From: Robert Makgill [REDACTED]
Sent: Wednesday, 16 November 2016 11:25 PM
To: TTRLApplication
[REDACTED]
Subject: RE: Fisheries Submitters' memorandum in support of requested extension

Dear Amy

I refer to my below email.

I apologise for the delay in filing the Fisheries Submitters memorandum on timetable directions. The delay is due to a Court of Appeal matter I have had to attend to this week, and more particularly the need to secure an expert from outside New Zealand to assess certain aspects of the plume information released on 10 November.

The Fisheries Submitters will seek to address the timetable directions sought by the Applicant in the next few working days. In the meantime, it is my understanding, Kiwis Against Seabed Mining Incorporated, Te Runanga o Ngati Ruanui Trust and Talley's Group Limited will file a joint memorandum addressing the timetable directions sought by the Applicant by the end of this week.

It is respectfully submitted, in the circumstances, that the DMC should issue a direction to all submitters setting a date by which any replies to the Applicant's proposed timetable should be filed. This would ensure that all submitters who wish to express a view on the proposed timetable are afforded that opportunity as a matter of procedure.

I would be grateful if this email could be placed before the DMC.

Kind regards

ROBERT MAKGILL
Barrister, LL.M HONS (1st)

[REDACTED]

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From: Robert Makgill
Sent: Thursday, 10 November 2016 5:40 p.m.
To: 'TTRLApplication' <TTRL.Application@epa.govt.nz>

[REDACTED]

Subject: RE: Fisheries Submitters' memorandum in support of requested extension

Dear Amy

This is just to note that the Fisheries Submitters will be filing a memorandum in response to TTR's request for timetable directions.

I would be grateful if you could let the DMC know that the Fisheries Submitters will file a memorandum next week, once the Fisheries Submitters have a better idea of the work involved in preparing evidence, expert availability ... etc.

Kind regards

ROBERT MAKGILL
Barrister, LL.M HONS (1st)

[REDACTED]

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