

Before Queenstown Lakes District Council

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In the matter of                      the Resource Management Act 1991

And                                      **The Queenstown Lakes District Proposed District Plan –  
Topic 15**

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**Memorandum of Counsel seeking time extension for filing evidence**

Submitters #2466 (Real Journeys); #2581 (Go Orange); #2492 Cardrona Alpine Resort; #2494 (Te Anau Developments Limited).

Dated 02 August 2018

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**anderson  
lloyd.**

**May it please the Panel**

- 1 This Memorandum of Counsel is written on behalf of Submitters #2466 (Real Journeys); #2581 (Go Orange); #2492 Cardrona Alpine Resort; #2494 (Te Anau Developments Limited) (**Submitters**).
- 2 Ms Fiona Black is the Concessions and Consents Manager for Real Journeys and is the key staff member for the named submitter organisations in relation to the DPR process, and the primary client contact for confirming instructions and reviewing evidence. Ms Black has been ill during this lead up to the deadline for submission of evidence on 6 August, and it has become apparent she is not likely to recover in sufficient time to meet that deadline.
- 3 Ms Black is preparing evidence for Topic 15, and is the primary client contact for confirming instructions and reviewing the other evidence to be presented, from Mr Farrell.
- 4 Given these circumstances, Counsel respectfully requests a short extension/waiver of the filing date until **4pm Thursday 9 August 2018**: for the evidence from the named submitters, namely:
  - (a) Fiona Black (operational / submitter evidence);
  - (b) Ben Farrell (planning evidence).

*Maree Baker-Galloway*

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Maree Baker-Galloway  
Counsel for the Submitters