

**BEFORE THE COMMISSIONERS ON BEHALF OF
QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER The Resource Management Act
1991

IN THE MATTER Of the Queenstown District Plan
Review Chapter 21 and 33

BY **JEREMY BELL INVESTMENTS
LIMITED**

Submitter (782/784/1030/1091)

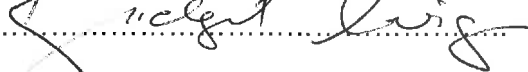
**MEMORANDUM OF COUNSEL REQUESTING EXTENSION OF TIME TO
FILE EVIDENCE**

**GALLAWAY COOK ALLAN
LAWYERS
DUNEDIN**

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MAY IT PLEASE THE COMMISSIONERS:

1. Counsel requests a 24 hour extension to file evidence on behalf of Jeremy Bell Investments Limited ("JBIL").
2. JBIL have engaged the following experts:
 - a. Peter Espie – Ecologist
 - b. Allan Cubitt – Resource Management Planner
3. JBIL will also produce evidence from Mandy Bell a Director and Shareholder of JBIL.
4. Unfortunately, some unexpected commitments and illness has lead to delays in preparing evidence and synopsis of legal submissions such that it is not ready to file today. A further 24 hours will ensure that the evidence is well researched and prepared to ensure it can add the most value to the panel hearing the relevant matters.
5. Therefore Counsel respectfully requests an extension to file the evidence until 12pm tomorrow.
6. The Submitter has requested to be heard in the second week of the hearing, commencing 16 May therefore there remains adequate time for the evidence to be received and read.

Signed: 
B Irving
Solicitor for Jeremy Bell Investments Limited

Date: 20 - 4 - 16.