

Before the Hearings Commissioners  
at Christchurch

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*in the matter of:* a submission and further submission on the proposed  
Canterbury Land and Water Regional Plan under the  
Resource Management Act 1991

*to:* **Environment Canterbury**

*submitter:* **Meridian Energy Limited**

Memorandum of counsel on behalf of Meridian Energy Limited

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Dated: 23 April 2013

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COUNSEL: AR Galbraith QC ([argalbraith@shortlandchambers.co.nz](mailto:argalbraith@shortlandchambers.co.nz))

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**MEMORANDUM OF COUNSEL**

- 1 Meridian Energy Limited's (*Meridian*) presented its evidence on the proposed Canterbury Land and Water Regional Plan (*Proposed Plan*) to the Hearing Commissioners on 28 February 2013.
- 2 During its presentation, the Hearings Commissioners requested further information from two of Meridian's witnesses, Dr Mark James and Ms Sarah Dawson.
- 3 Accompanied with this memorandum of counsel is a supplementary brief of evidence from Dr James.
- 4 The purpose of this memorandum is to inform the Hearing Commissioners that due to a car accident over Easter, Ms Dawson has suffered some injuries and will not be in a position to finalise and file her supplementary brief of evidence for approximately 6-8 weeks.
- 5 Meridian is aware the final week of the Proposed Plan Hearing is scheduled to be the week ending 5 July 2013. Meridian anticipates Ms Dawson's supplementary evidence will be filed by this date.

Dated: 23 April 2013

A handwritten signature in blue ink, appearing to read 'J Galbraith', is written over a light blue rectangular background.

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**AR Galbraith QC / JM Appleyard**  
Counsel for Meridian Energy Limited