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IN THE HIGH COURT OF NEW ZEALAND  
WELLINGTON REGISTRY

I TE KŌTI MATUA O AOTEAROA  
TE WHANGANUI-Ā-TARA ROHE

CIV-2022-485-650

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UNDER	The Judicial Review Procedure Act 2016 and the Declaratory Judgments Act 1908
BETWEEN	<b>Te Rūnunga o Ngāi Tahu</b> Applicant
AND	<b>Te Ohu Kai Moana Trustee Ltd</b> First Respondent
AND	<b>Minister for Oceans and Fisheries</b> Second Respondent

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MEMORANDUM OF COUNSEL FOR THE FIRST RESPONDENT IN ADVANCE OF CASE  
MANAGEMENT CONFERENCE

4 November 2022

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Judicial officer: unknown  
Next event date: Judge's Chambers List Monday 7 November 2022 at 10am

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Counsel:

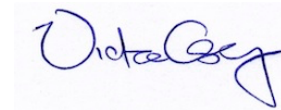
Victoria Casey KC  
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**May it please the Court:**

1. This application for judicial review was served on 1 November 2022, and counsel was instructed on 3 November.
2. The applicant has filed an application for urgency seeking for the case to heard and determined before late November.
3. The first respondent wishes to be heard in relation to that application, as it is not clear that urgency (at least at the level sought by the applicant) is warranted in this case.
4. The first respondent also records that given the nature of the claim it may be appropriate for the Court to direct service of the proceeding on the other Mandated Iwi Organisations, as their interests appear to be directly affected. Any timetable directions made by the Court should allow for that to occur and for a reasonable opportunity for those Organisations to consider their position and take steps in response, if they wish to do so.

Dated: 3 November 2022



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Victoria Casey KC  
Counsel for the first respondent

This memorandum is filed by Brianna Boxall, solicitor for the first respondent, or Te Ohu Kai Moana. The address for service of the first respondent is 158 The Terrace, Wellington.

Documents for service on the filing party may be left at the address for service or emailed to the solicitor at [Brianna.boxall@teohu.maori.nz](mailto:Brianna.boxall@teohu.maori.nz)