

**IN THE HIGH COURT OF NEW ZEALAND
DUNEDIN REGISTRY**

**I TE KŌTI MATUA O AOTEAROA
ŌTEPOTI ROHE**

CIV-2021-412-000089

UNDER the Declaratory Judgments Act 1908

IN THE MATTER of an application under the Declaratory Judgment Act 1908

BETWEEN **OTAGO REGIONAL COUNCIL**, a body corporate under the Local Government Act 2002

Plaintiff

AND **ROYAL FOREST AND BIRD PROTECTION SOCIETY OF NEW ZEALAND INCORPORATED**, a duly incorporated society under the Incorporated Societies Act 1908 having its registered office at 205 Victoria Street, Wellington

Defendant

**MEMORANDUM OF COUNSEL FOR THE PLAINTIFF IN RESPONSE TO THE
MEMORANDUM OF THE MINISTER FOR THE ENVIRONMENT DATED 26
OCTOBER 2021**

Dated: 27 October 2021

**ROSS DOWLING MARQUET GRIFFIN
SOLICITORS
DUNEDIN**

Telephone: (03) 477 8046
Facsimile: (03) 477 6998
PO Box 1144, DX YP80015

Solicitor: A J Logan

**MEMORANDUM OF COUNSEL FOR THE PLAINTIFF IN RESPONSE TO THE
MEMORANDUM OF THE MINISTER FOR THE ENVIRONMENT DATED 26
OCTOBER 2021**

May it Please the Court:

1. This memorandum is filed by the Otago Regional Council (“ORC”) in response to the Registrar’s enquiry as to whether the ORC will be filing a memorandum in response to the Minister for the Environment’s Memorandum dated 26 October 2021.

2. The ORC has no objection to the Minister for the Environment’s Memorandum dated 26 October 2021 or the directions sought therein.



A J Logan/ T M Sefton
Counsel for the Otago Regional Council

27 October 2021

Date