

**BEFORE THE INDEPENDENT HEARINGS COMMISSIONER
APPOINTED BY THE INVERCARGILL CITY COUNCIL**

UNDER the Resource Management Act 1991
IN THE MATTER of Part 8 of the Act
BY **SPACE OPERATIONS NEW ZEALAND
LIMITED**
RequestorRequestor

MEMORANDUM OF COUNSEL

Dated: 14 September 2026

Todd Walker

Solicitor acting
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MAY IT PLEASE THE COMMISSIONER:

- [1] This memorandum is filed by counsel for Space Operations New Zealand Limited (**Requestor**).

Counsel advises that the briefs of evidence of Mr Robin McNeill (Requestor), and Mr Alex Dunn (planning) have been filed today, alongside this memorandum.

- [2] Due to unavoidable circumstances, briefs of evidence prepared by Mr Graham Hulston (radio engineering) and a peer review statement from Mr John Kyle (planning) are unable to be filed today. Counsel will file these briefs promptly tomorrow. Both are comparatively short documents.
- [3] In the circumstances, counsel respectfully submits that no prejudice will arise to any party from the filing of Mr Hulston's evidence and Mr Kyle's short peer review statement tomorrow. The Requestor would not oppose an equivalent extension to Submitter evidence being filed.
- [4] Counsel therefore respectfully seeks leave for Mr Hulston's evidence and Mr Kyle's peer review statement to be filed as promptly as possible tomorrow, being Tuesday 15 September 2026.

Dated: 14 September 2026



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R E M Hill
Counsel for the RequestorRequestor