

233 Taylors Mistake Road  
CHRISTCHURCH 8081

24 February 2011

By Hand *Post*

To  
The Registrar  
Environment Court  
PO box 2069  
CHRISTCHURCH



Attention: Mr D Goodman

**Env-2010-CHC-0262: O SNOEP V CHRISTCHURCH CITY COUNCIL & TAYLORS  
MISTAKE ASSOCIATION INCORPORATED**

Please find enclosed a memorandum of Applicant dated 24 February 2011.

Yours faithfully

A handwritten signature in blue ink, appearing to read "O Snoop".

Otto Snoop

Copy by Hand: *Post*

Christchurch City Council c/- Buddle Findlay Lawyers, attention W Palmer of PO Box 322,  
Christchurch 8140.

and

Taylors Mistake Association Incorporated c/- White Fox & Jones Lawyers, attention T  
Evatt of PO box 1353, Christchurch 8140.

**BEFORE THE ENVIRONMENT COURT  
AT CHRISTCHURCH**

**Env-2010-CHC-0262**

**BETWEEN**

**O SNOEP**

**Applicant**

**AND**

**CHRISTCHURCH CITY  
COUNCIL**

**First Respondent**

**AND**

**TAYLORS MISTAKE  
ASSOCIATION  
INCORPORATED**

**Second Respondent**

**MEMORANDUM OF APPLICANT**

**24 February 2011**

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**OTTO SNOEP**

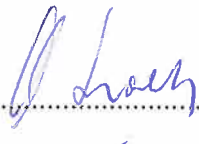
**Applicant**

**233 Taylors Mistake Road  
CHRISTCHURCH 8081**

**MAY IT PLEASE THE COURT**

1. In accordance with leave granted in the Record of Pre-Hearing Conference I confirm that this day I filed an Amended Application for Enforcement Order in duplicate including an Amended Affidavit in support dated 24 February 2011, with the Court together with two copies of the Service of Notice for Application of Enforcement Order on the respondents listed in the Amended Application.
2. The Application has been amended so that it seeks orders against the owners of each individual bach, together with an order against the Christchurch City Council as owner of the legal road on which the baches are located.
3. I formally seek leave to withdraw the Application against the Taylors Mistake Association Incorporated as a Respondent, but I continue to have them included in the list of persons to be served with a copy of the Amended Application as I understand that Counsel for the Association will now be acting for those members affected by the Application with the exception of bach 31 that is held in the name of Mr RA Rankin. Both Mr Rankin and the Christchurch City Council will be served separately with the Notice of the Amended application.

DATED this 24<sup>th</sup> day of February 2011

  
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O Snoep