

**BEFORE THE ENVIRONMENT COURT**

**IN THE MATTER OF** the Resource Management Act 1991 (The Act)  
of notice of motion under Section 87G  
requesting the granting of Resource Consents to  
**WELLINGTON INTERNATIONAL AIRPORT  
LIMITED** for the **WELLINGTON  
INTERNATIONAL AIRPORT EXTENSION OF  
RUNWAY CONSTRUCTION, OPERATION  
AND MAINTENANCE**

**[ ENV-2016-WLG-000058 ]**

**BETWEEN** JUMPJET HOLDINGS LIMITED  
**AND** WELLINGTON INTERNATIONAL AIRPORT  
LIMITED  
**TO** Registrar; and to  
Applicant for Consent; and to  
Section 274 Parties

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**MEMORANDUM ACCOMPANYING COSTS APPLICATION**

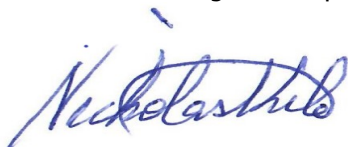
15<sup>th</sup> April 2019

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**MAY IT PLEASE THE COURT:**

1. Jumpjet Holdings Limited states that Costs have been applied for as instructed under Clause 6.6(f) of the Environment Court Practice Note 2014 and the Closing Date for Counter Claim was the 20<sup>th</sup> January 2019. The Applicant (WIAL) has not respected the Court Practice Timeframes and the counter claim is invalid.
2. The Applicant (WIAL) has applied for a waiver or directions on the 5<sup>th</sup> of February 2019. Jumpjet rejects the waiver application but confirms that directions would be appropriate as we are unable to negotiate with the applicant.
3. Jumpjet Holdings Limited states that Costs have been claimed and qualified in the Cost Application of the 30<sup>th</sup> of December 2018 and the Memorandum of the 1<sup>st</sup> of February 2019.
4. Key Aspects of the Jumpjet Airlines regional development have been stayed and the Head Office resources re-focussed on this case before the Court for some 3 years. We do not accept that the Claim tabled is unreasonable and limited to one Judicial Conference. Particularly as the Applicant (WIAL) has strategically undertaken tactics to stay proceedings around technical safety standards, law and technical industry document requirements.
5. Jumpjet Holdings Limited submits to the Court for the Costs decision.

**DATED:** at Wellington 15 April 2019



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