

In the High Court of New Zealand  
Tauranga Registry  
I Te Kōti Matua o Aotearoa  
Tauranga Moana Rohe

CIV-2021-470-

---

*under:* the Trusts Act 2019 and Part 18 of the High Court  
Rules 2016

*in the matter of:* an application under sections 130 and 133 of the Trusts  
Act 2019 by **William Beau Holland, Natalie Anne  
Bridges, Peter John Blackwell, Peter John Farmer,  
Mark Edmond Arundel and Tina Lynn Jennen**, as  
trustees of the Tauranga Energy Consumer Trust  
*First plaintiffs*

*and in the matter of:* an application under section 133 of the Trusts Act 2019  
by **William Beau Holland, Natalie Anne Bridges,  
Peter John Blackwell, Peter John Farmer, Mark  
Edmond Arundel and Tina Lynn Jennen**, as trustees  
of the TECT Charitable Trust  
*Second plaintiffs*

Consent memorandum for independent counsel

---

Dated: 12 May 2021

---

Reference: M D Arthur (michael.arthur@chapmantripp.com)  
L C Bercovitch (liora.bercovitch@chapmantripp.com)  
Counsel: Justin Smith QC

chapmantripp.com  
T +64 9 357 9000  
F +64 9 357 9099

PO Box 2206  
Auckland 1140  
New Zealand

Auckland  
Wellington  
Christchurch

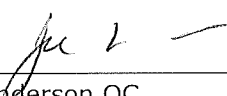


**CONSENT MEMORANDUM FOR INDEPENDENT COUNSEL**

May it please the Court -

- 1 I consent to the appointment of independent counsel on the terms set out in the plaintiffs' interlocutory application at paragraphs [5] to [7].
- 2 Independent counsel can be contacted at [jfa@shortlandchambers.co.nz](mailto:jfa@shortlandchambers.co.nz) and 09 307 9800.

Dated: 12 May 2021

  
\_\_\_\_\_  
J Anderson QC