IN THE WAITANGI TRIBUNAL

Wai 3325
Wai 2397

IN THE MATTER The Climate Change Priority Inquiry (Wai 3325)

A N D

IN THE MATTER of a claim by the Ngāti Hine Forestry Trust on behalf of the beneficial owners of Ngāti Hine H2B (Wai 2397)

MEMORANDUM OF COUNSEL

Dated this 18th day of October 2024

RECEIVED
Waitangi Tribunal
18 Oct 24
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel is filed on behalf of the Ngāti Hine Forestry Trust (Wai 2397) ("the claimants").

2. By way of Memorandum-Directions dated 8 October 2024, her Honour Judge Milroy directed that any evidence to be heard at hearing one be filed by no later than 5pm, Monday 21 October 2024.[1]

3. The claimants have three witnesses intending to present evidence at hearing one and while their evidence is significantly progressed, further time is required to finalise their evidence.

4. Unfortunately, the time available to counsel to meet with witnesses and progress their evidence has been limited in recent weeks due to counsels' involvement in the Wai 2575 Te Aka Whai Ora Priority Inquiry and Wai 3300 Treaty Principles Bill Urgent Inquiry. Counsel note that both of these inquiries had significantly compressed timetabling with closing submissions due on 14 October 2024.

5. The claimants' witnesses also have a number of competing commitments limiting their availability and ability to finalise their evidence ahead of the filing deadline.

6. Accordingly, the claimants respectfully request an extension to file the claimants' evidence **by 5pm, 30 October 2024**.

DATED at Whangarei this 18th day of October 2024

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Season-Mary Downs/Chelsea Terei/Majka Cherrington
Counsel for the claimants

[1] Wai 3325, #2.5.13, *Memorandum-Directions of Judge Stephanie Milroy* (8 October 2024) at [22].