

BEFORE THE WAITANGI TRIBUNAL

WAI 3325  
WAI 3395

IN THE MATTER OF

the Treaty of Waitangi Act  
1975

AND

IN THE MATTER OF

the Climate Change Priority  
Inquiry (Wai 3325)

AND

IN THE MATTER OF

a claim by **Pita Tipene, Moana Maniapoto, George Laking, India Logan-Riley, Donna Kerridge, Aroha Te Pareake Mead, and Maria Bargh** for and on behalf of **Ngā Toki Whakarururanga (WAI 3395)**.

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**MEMORANDUM OF COUNSEL FILING AFFIRMED AFFIDAVIT OF INDIA  
LOGAN-RILEY**Dated this 29<sup>th</sup> day of October 2024

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<b>RECEIVED</b> Waitangi Tribunal
<b>29 Oct 24</b>
Ministry of Justice WELLINGTON



**Annette Sykes & Co**  
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## TĒNĀ E TE TARAIPIUNARA

1. This Memorandum of Counsel is filed on behalf of the claimants for Wai 3395, that is Donna Kerridge, Pita Tipene, Moana Maniapoto, Dr George Laking, India Logan-Riley, Dr Maria Bargh, and Aroha Te Pareake Mead, for and on behalf of Ngā Toki Whakarururanga.
2. On 21 October 2024, counsel filed affidavits by Professor Elizabeth Jane Kelsey, Professor Ema Maria Bargh, and India Logan-Riley. These affidavits are intended to be relied upon for Professor Bargh's evidence, to be heard in hearing one.
3. Due to the complication of Ms Logan-Riley residing in Fiji, counsel filed her affidavit unsworn and indicated that the affirmed affidavit would be filed that week.
4. Ms Logan-Riley was only able to set down an appointment at the New Zealand High Commission for affirming her affidavit today, 29 October.
5. The affirmed copy of Ms Logan-Riley's affidavit is provided with this memorandum.

**Dated** at Rotorua this 29<sup>th</sup> day of October 2024



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Annette Sykes



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Sam Vincent

Counsel for the Claimants