

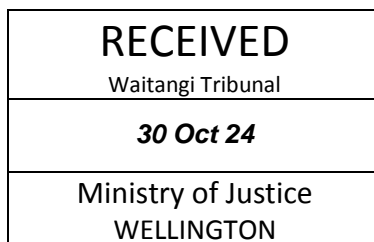
IN THE WAITANGI TRIBUNAL**Wai 3325
Wai 2397****IN THE MATTER**

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 30th day of October 2024**



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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. By email dated 21 October 2024, the claimants were granted an extension to file their evidence by 5pm, 30 October 2024.
4. Accordingly, please see attached the following documents for filing:
 - (a) Kōrero Taunaki o Pita Tipene;
 - (b) Appendix A: Strategic Intent of the Ngāti Hine Forestry Trust;
and
 - (c) Kōrero Taunaki o Beth (Te Tui) Tui Shortland.
5. Regrettably, counsel have not been able to finalise and confirm the evidence of Mr Waihoroi Shortland ahead of the filing deadline due to competing commitments limiting Mr Shortland’s availability.
6. Accordingly, the claimants respectfully request an extension to file their final brief of evidence **by 5pm, 1 November 2024**.

DATED at Whangarei this 30th day of October 2024



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

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