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BEFORE THE WAITANGI TRIBUNAL **WAI 3287**
I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI **WAI 3325**

IN THE MATTER of the Treaty of Waitangi Act 1975

AND

IN THE MATTER of a claim by **Chris Insley** on behalf of Te Taumata and Māori generally

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MEMORANDUM OF COUNSEL FILING EVIDENCE OF CHRIS KARAMEA INSLEY

31 October 2024

RECEIVED
Waitangi Tribunal
31 Oct 24
Ministry of Justice
WELLINGTON

KĀHUI LEGAL

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TĒNĀ, E TE TARAIPIUNARA:

1. This memorandum of counsel accompanies the filing of the brief of evidence for Mr Chris Insley. This is the last of the briefs of evidence to be filed for the first hearing week of this Inquiry for the Wai 3325 claim. Pursuant to the extension granted by the Tribunal this brief of evidence for Mr Insley was due for filing on 25 October 2024.

2. I apologise to the Tribunal for the very late filing of Mr Insley's evidence. Fault for the delay is entirely mine. I had been working with Mr Insley on his evidence alongside appearing at hearings both last week and earlier this week. Despite these hearings I thought it would be possible to finalise Mr Insley's evidence and file it by the 25 October deadline. However, that proved to be incorrect.

3. As will be apparent from Mr Insley's evidence he has extensive experience in climate change matters. We are likely to seek to file a more technical brief of evidence from Mr Insley in one of the later hearing weeks. However, Mr Insley's current brief of evidence is very much in the nature of scene setting evidence and is not overly technical in nature. Hopefully, this will avoid any prejudice to the Crown from this late filing.

4. Counsel respectfully seeks leave for the late filing of Mr Insley's brief of evidence.

DATED at Wellington this 31st day of October 2024

M K Mahuika
Counsel for Wai 3287