

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 7th day of November 2024**

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Waitangi Tribunal

8 Nov 24Ministry of Justice
WELLINGTON

p 09 404 0953
a 91 Hupara Road, RD2 Kaikohe, Northland 0472
e admin@tukaulaw.co.nz
w www.tukaulaw.co.nz

Counsel acting**Season-Mary Downs
Chelsea Terei
Majka Cherrington
Emma Jackson**

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 claimant counsel to file any opening submissions to be presented at hearing one by 5pm, Monday 11 November 2024.¹
3. Counsel confirm that the claimants intend to file and present opening submissions ahead of their evidence at hearing one.
4. Unfortunately, counsels’ ability to progress the claimants’ opening submissions in line with the Tribunal’s filing deadline has been impacted by a number of pressing matters arising from counsels’ involvement in the Wai 3300 Treaty Principles Bill Urgent Inquiry and the Government’s early introduction of the Treaty Principles Bill.
5. Accordingly, counsel require further time to complete and file the claimants’ opening submissions and respectfully request an extension to do so by **5pm Thursday, 14 November 2024**.

DATED at Whangarei this 7th day of November 2024



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

¹ Wai 3325, #2.5.13(a), *Appendix A: Hearing one filing milestones for the Wai 3325 priority inquiry* (8 October 2024).