OFFICIAL

IN THE WAITANGI TRIBUNAL **KEI MUA I TE TARAIPIUNARA**	**WAI 3325** **WAI 421** **WAI 593** **WAI 869** **WAI 1383** **WAI 1890** **WAI 3278** **WAI 3288** **WAI 3279**
UNDER	**The Treaty of Waitangi Act 1975**
CONCERNING	**The Climate Change Priority Inquiry**
AND	**Claims brought by Te Waimate Taiamai ki Kaikohe Claims Alliance (Wai 421, Wai 593, Wai 869, Wai 1383, Wai 1890)**
AND	**The Ngāti Ruapani ki Waikaremoana Climate Change Claim (Wai 3278)**
AND	**The Ngāti Porou ki Hauraki Climate Change Claim (Wai 3279)**
AND	**Te Upokorehe Future Generations Climate Change Claim (Wai 3288)**

JOINT MEMORANDUM OF COUNSEL FILING EVIDENCE OF DR JAMES EVERY-PALMER KC

Dated: 11 March 2025

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Waitangi Tribunal
11 Mar 25
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

KIA WHAKAAE MAI TE TARAIPIUNARA

1. This joint memorandum of counsel is filed on behalf of:

    a. The combined claims of Te Waimate Taiamai ki Kaikohe Alliance (Wai 421, 593, 869, 1383, 1890).

    b. Vernon Winitana on behalf of Ngāti Ruapani ki Waikaremoana (Wai 3278).

    c. Trevor Ransfield, Wayne Aramoana, Gaylene Kohunui, Maude Edwards, Kahukore Baker, Jimi Hills, Wallace Aramoana and Aroha Wikotu on behalf of Te Upokorehe (Wai 3279).

    d. John Henry Tamihere on behalf of Ngāti Porou ki Hauraki (Wai 3288).

2. Claimants wishing to present in hearing week two were directed to file their evidence by 7 March 2025.

3. This memorandum accompanies the brief of evidence of Dr James Every-Palmer, whom the claimants have asked to provide expert evidence in this inquiry. Leave is respectfully sought to file the evidence after the deadline, as it has only just been completed and approved.

4. Dr Every-Palmer's evidence falls into the category of non-tangata whenua evidence which needs to be presented during hearing week 2,[1] and leave is also sought to allow for this. Coordinating counsel are developing a draft timetable and confirm that there is time available.

Dated: 11 March 2025

Bryce Lyall
Counsel for the Claimants

Hannah Swedlund

[1] Wai 3325 #2.6.4 at [20].