OFFICIAL

BEFORE THE WAITANGI TRIBUNAL	**WAI 3325**
UNDER	the Treaty of Waitangi Act 1975
IN THE MATTER OF	the Climate Change Priority Inquiry **(Wai 3325)**
AND	
IN THE MATTER OF	**Wai 3382**.

MEMORANDUM OF COUNSEL

Dated this 31st day of March 2025

RECEIVED
Waitangi Tribunal
31 Mar 25
Ministry of Justice
WELLINGTON

ANNETTE SYKES & Co.
barristers & solicitors

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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of Wai 3382, a claim by Mere Brooks, John Hooker, Alan Joseph Fred Hooker and Allen Webb for and on behalf of members of their respective hapū of Ngāruahine.

2. Counsel provide with this memorandum:

    a. Summarised affidavit of John Hooker;

    b. Summarised affidavit of Alison Cole;

    c. Opening submissions for this claim for hearing two.

3. Counsel apologise for the delay in filing these materials to today. These filings have relied on a number of consultations with these witnesses.

4. Mr Hooker wishes to give his evidence in te reo Māori. Counsel therefore seek for a reo Māori interpreter to be present when he gives his evidence on the morning of Monday 7 April.

Dated this 31st day of March 2025

Annette Sykes

Sam Vincent

Counsel for the Claimants