IN THE WAITANGI TRIBUNAL	**WAI 3325** **WAI 3285**
CONCERNING	the Treaty of Waitangi Act 1975
AND **IN THE MATTER OF**	The Climate Change Priority Inquiry
AND **IN THE MATTER OF**	A claim by Lani Kereopa, Nicki Douglas, Roana Bennett and Mariana Te Rangi for and on behalf of themselves as representatives of their whānau, hapū and iwi and as representatives of Te Urunga o Kea the Te Arawa Climate Change Working Group

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MEMORANDUM OF COUNSEL FILING
JOINT BRIEF OF EVIDENCE OF LANI KEREOPA AND NICOLA DOUGLAS

Dated this 28TH day of April 2025

RECEIVED
Waitangi Tribunal
28 Apr 25
Ministry of Justice
WELLINGTON

TE WHENUA LAW

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Principal
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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Lani Kereopa, Nicki Douglas, Roana Bennett and Mariana Te Rangi for and on behalf of themselves as representatives of their whānau, hapū and iwi and as representatives of Te Urunga o Kea the Te Arawa Climate Change Working Group (Wai 3285).

2. In memorandum-directions dated 17 February 2025, her Honour Judge Milroy directed that claimant evidence being presented at hearing three must be filed by no later than 5pm, Monday 28 April 2025.

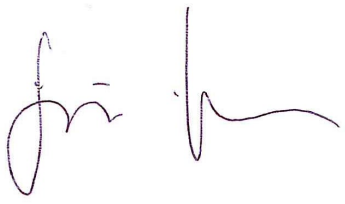
3. This memorandum accompanies for filing:

    a. Joint Brief of Evidence of Lani Kereopa and Nicola Douglas dated 28 April 2025.

    b. Index to Appendices to Joint Brief of Evidence of Lani Kereopa and Nicola Douglas dated 28 April 2025.

    c. Appendices to Joint Brief of Evidence of Lani Kereopa and Nicola Douglas dated 28 April 2025.

DATED this 28th day of April 2025



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Tania Te Whenua
Claimant Counsel