

I TE RŌPŪ WHAKAMANA  
I TE TIRITI O WAITANGI

WAI 3450  
WAI 2460

KEI RARO I TE MANA O  
Ā

te ture o te Treaty of Waitangi 1975

I TE TAKE O

te pakirēhua Wai 3450 mō ngā kerēme e  
pā ana ki Natural Resources me  
Environmental Management

Ā

I TE TAKE O

tētahi kerēme nā **Anthony Whareraupo  
Olsen rātou Ko Trudy Elizabeth Paatu  
Olsen, Ko Kathryn Fiona Wheturereata  
Olsen** rātou, me ngā iwi o **Waitaha** me  
**Kāti Māmoe** (Wai 2460)

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MEMORANDUM OF COUNSEL

DATED 13 JUNE 2025

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**TamakiLegal**  
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Counsel acting: V Tumai

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Waitangi Tribunal

13 Jun 25

Ministry of Justice  
WELLINGTON

## **Tēnā, e te Rōpū Whakamana i te Tiriti o Waitangi**

1. This Memorandum of Counsel is filed on behalf of Anthony Whareraupo Olsen, Trudy Elizabeth Paatu Olsen, and Kathryn Fiona Wheturereata Olsen, (“**Claimants**”) on behalf of Waitaha and Kāti Māmoe iwi (Wai 2460).
2. On 4 June 2025, an application for a priority hearing concerning the Fast-track Approvals Act 2024 (“**FTAA**”) was filed by Annette Sykes & Co barristers and solicitors on behalf of Wai 1194 and Wai 1212.<sup>1</sup>
3. By Memorandum-Directions dated 6 Pipiri 2025 His Honour, Judge Armstrong, directed the Crown and any other parties to file any submissions in response to the priority application filed on behalf of Wai 119 and Wai 1212 by 5pm, Friday 13 June 2025.<sup>2</sup>
4. While the Claimants have not yet been formally confirmed as a participating party in the Wai 3450 Natural Resources and Environmental Management Inquiry, their amended statement of claim has been filed and is currently awaiting confirmation from the Tribunal.
5. The Claimants confirm their support for Wai 1194 and Wai 1212 application for a priority hearing on the FTAA for the same reasons as set out in the application, and in counsel’s memorandum dated 6 May 2025 in relation to Wai 745 priority application.<sup>3</sup>

**DATED at Manukau this 13<sup>th</sup> day of June 2025**



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Victoria Tumai

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<sup>1</sup> A Sykes, J Potaka, M Te Hira, *Memorandum of Counsel*, dated 3 June 2025 (Wai 1194, #2.27, Wai 1212, #2.26)

<sup>2</sup> Waitangi Tribunal, *Memorandum-Directions of the Presiding Officer Judge Armstrong concerning the Wai 1194 and Wai 1212 Application for Priority* dated 6 Pipiri 2025

<sup>3</sup> V Tumai, *Memorandum of Counsel*, dated 6 May 2025 (Wai 3450, #3.1.35) [6] to [13]