

IN THE WAITANGI TRIBUNAL

WAI 3340

WAI 3325

IN THE MATTER OF Treaty of Waitangi Act 1975

AND IN THE MATTER OF Climate Change Kaupapa Priority Inquiry (Wai 3325)

AND IN THE MATTER OF A claim by Tōtaranui Nama Ono Trust (Wai 3340)

Memorandum of Counsel Filing of Evidence of J Shaw

Dated 17 July 2025

RECEIVED

Waitangi Tribunal

17 Jul 25

Ministry of Justice
WELLINGTON

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May it please the Tribunal:

1. Reference is made to the directions that the evidence of James Shaw was to be filed by 15 July 2025.
2. Counsel now with this memorandum files the *Brief of Evidence of the Hon. James Peter Edward Shaw* dated 26 June 2025 filed on behalf of Tōtaranui Nama Ono Trust (Wai 3340).
3. Counsel apologizes for the lateness in filing and seeks leave to file out of time.
4. Part of the delay related to the process of allowing the Crown to raise any objections they may have to Mr Shaw's evidence of his role as a Cabinet Minister. The Crown have now advised that they have no such objection.

Dated this 17th day of July 2025

michael sharp

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Michael Sharp
Counsel for Wai 3340