
KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA
I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL

WAI 1750

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the North-Eastern Bay of Plenty Inquiry

MEMORANDUM OF COUNSEL FOR THE CROWN FILING QUESTIONS ON
ADDITIONS TO #A36 REPORT

8 August 2025



**Te Tari Ture
o te Karauna**
Crown Law

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RECEIVED

Waitangi Tribunal

8 Aug 25

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. Appended to this memorandum are questions of clarification for Mark Derby on the additions to the #A36 report.¹
2. The Tribunal's leave is sought to file these after the deadline of 7 August.²

8 August 2025



C Linkhorn / D Hunt
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel

¹ Wai 1750, #A36(k).

² Wai 1750, #2.6.34 at [16(a)].