IN THE WAITANGI TRIBUNAL

Wai 3325
Wai 2397

IN THE MATTER The Climate Change Priority Inquiry (Wai 3325)

A N D

IN THE MATTER of a claim by the Ngāti Hine Forestry Trust on behalf of the beneficial owners of Ngāti Hine H2B (Wai 2397)

MEMORANDUM OF COUNSEL

Dated this 1st day of September 2025

TUKAU
LAW AND CONSULTANCY

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Majka Cherrington

RECEIVED
Waitangi Tribunal
1 Sep 25
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel is filed on behalf of the Ngāti Hine Forestry Trust (Wai 2397) ("the claimants") and concerns the evidence of Mr Waihoroi Shortland.[1]

2. As the Tribunal will recall, Mr Shortland was scheduled to present his evidence during hearing week one and, subsequently, during hearing week three. On both occasions Mr Shortland was unable to present due to illness.

3. Given the above, counsel now seek leave for Mr Shortland's evidence to be taken as read and for any questions to be put to him in writing.

4. Counsel consider this to be a pragmatic way forward, particularly in light of the limited hearing time available and the number of claimant witnesses who are yet to present their evidence.

DATED at Whangarei this 1st day of September 2025

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Season-Mary Downs/Majka Cherrington
Counsel for the claimants

[1] Wai 3325, #A21, *Kōrero Taunaki o Waihoroi Shortland* (1 Noema 2024).