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

BEFORE THE WAITANGI TRIBUNAL **WAI 3325**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**the Climate Change Priority Inquiry**

MEMORANDUM OF COUNSEL FOR THE CROWN

26 Hepetema | September 2025

Te Tari Ture o te Karauna
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Waitangi Tribunal
26 Sep 25
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. Counsel have been directed to file requests to cross-examine hearing four witnesses by 25 September 2025.[1]

2. In this memorandum, the Crown seeks leave to cross-examine all witnesses appearing in hearing four. The Crown apologises for the delay in filing this memorandum and seeks leave accordingly.

3. The Crown seeks 40 minutes of cross-examination time for each of the following witnesses:

    3.1 Dr Oliver Sutherland;

    3.2 Dr Shaun Awatere;

    3.3 Abigail Smith;

    3.4 Stephen Goldthorpe;

    3.5 John Ballingall;

    3.6 Dr Rhys Jones;

    3.7 Dr Claire Charters;

    3.8 Ilan Noy;

    3.9 Dr Kēpa Morgan;

    3.10 Daniel Hikuroa;

    3.11 Alexandra Macmillan; and

    3.12 Professor Timothy Naish.

[1] Wai 3325, #2.6.14(a).

4. The Crown seeks 20 minutes of cross-examination time for each of the remaining witnesses.

26 Hepetema | September 2025

J Prebble / N Fong / G Seeley / A McTaggart
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel