IN THE WAITANGI TRIBUNAL	**WAI 3325** **WAI 3286**
CONCERNING	the Treaty of Waitangi Act 1975
AND **IN THE MATTER OF**	The Climate Change Priority Inquiry
AND **IN THE MATTER OF**	A claim by Tui Aroha Warmenhoven on behalf of herself as Trustee and Chair of Umuariki Marae and members of Ngāti Rangi Hapū and Te Whānau a Umuariki Hapū of Ngāti Uepōhatu Iwi of Te Papatipu o Uepohatu of the Ruatoria District

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MEMORANDUM OF COUNSEL FILING
SPEAKING NOTES OF DR SHAUN AWATERE

Dated this 29th day of September 2025

RECEIVED
Waitangi Tribunal
29 Sep 25
Ministry of Justice
WELLINGTON

TE WHENUA LAW

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Principal
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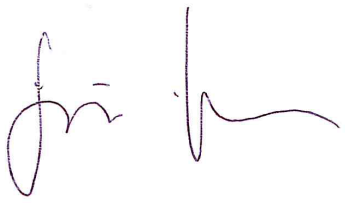
MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Tui Aroha Warmenhoven as Trustee and Chair of Umuariki Marae for members of Ngāti Rangi Hapū and Te Whānau a Umuariki Hapū of Ngāti Uepōhatu Iwi of Te Papatipu o Uepohatu of the Ruatoria District (Wai 3286).

2. In memorandum-directions dated 16 September 2025, her Honour Judge Milroy directed that speaking notes for briefs of evidence to be presented at hearing four must be filed by no later than 5pm, Tuesday 7 October 2025.[1]

3. Accordingly, this memorandum accompanies for filing the speaking notes of Dr Shaun Awatere.

DATED this 29th day of September 2025



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Tania Te Whenua
Claimant Counsel

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Lauren Chand
Claimant Counsel

[1] Wai 3325 #2.6.15.