

**IN THE WAITANGI TRIBUNAL  
KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI**

**WAI 3400  
WAI 2764**

**IN THE MATTER OF** The Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF** the Marine and Coastal Area (Takutai Moana) Act 2011

**AND**

**IN THE MATTER OF** a claim by Gillean Kathleen Caldwell on behalf of Ngātiwai Trust Board and Ngātiwai whānau, marae and hapū

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**MEMORANDUM OF COUNSEL FILING SECOND SUPPLEMENTARY  
AFFIDAVIT OF JUSTINE LEANNE INNS**

Dated this 23<sup>rd</sup> day of May 2025

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**This document is filed by:-**

**DIXON & CO LAWYERS**

**RECEIVED**

Waitangi Tribunal

**23 May 25**

Ministry of Justice  
WELLINGTON



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**TĒNA, E TE TARAIPUNARA:**

1. This memorandum of counsel is filed on behalf of Gillean Kathleen Caldwell on behalf of the Ngātiwai Trust Board and Ngātiwai whānau, marae and hapū (Wai 2764).
2. On 20 May 2025 counsel sought leave to file an unsworn second supplementary affidavit of Justine Leanne Inns, clarifying a minor detail in her earlier affidavit marked #B34 on the record of inquiry. A sworn version of this affidavit is filed alongside this memorandum.
3. Counsel respectfully seek leave to file it on the record of inquiry out of time and submit that no party will be prejudiced should the leave sought be granted.

**DATED** at Auckland this 23<sup>rd</sup> day of May 2025.



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**Kelly Dixon / Toni Talamaivao / Harriett Morrow**

Counsel for Wai 2764