IN THE WAITANGI TRIBUNAL **KEI MUA I TE TARAIPIUNARA**	**WAI 3325** **WAI 421** **WAI 593** **WAI 869** **WAI 1383** **WAI 1890** **WAI 3278** **WAI 3288** **WAI 3279**
UNDER	**The Treaty of Waitangi Act 1975**
CONCERNING	**The Climate Change Priority Inquiry**
AND	**Wai 421, Wai 593, Wai 869, Wai 1383, and Wai 1890**
AND	**Wai 3278**
AND	**Wai 3279**
AND	**Wai 3288**

JOINT MEMORANDUM OF COUNSEL

Dated: 18 November 2025

Counsel:
Bryce Lyall
Kōkiri Chambers
PO Box 60649
Titirangi
Auckland 0642
022 658 1895
Bryce@kokirichambers.nz

Maithili Sreen & Hannah Swedlund
Employed Barristers
Maithili@brycelyall.com & Hannah@brycelyall.com

KŌKIRI CHAMBERS

RECEIVED
Waitangi Tribunal
18 Nov 25
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

KIA WHAKAAE MAI TE TARAIPIUNARA

1. This memorandum of counsel is filed on behalf of the following claimants:

    a. Te Waimate Taiamai ki Kaikohe Claims Alliance (Wai 421, Wai 593, Wai 869, Wai 1383, Wai 1890);

    b. The Ngāti Ruapani ki Waikaremoana Climate Change Claim (Wai 3278);

    c. The Ngāti Porou ki Hauraki Climate Change Claim (Wai 3288); and

    d. Te Upokorehe Future Generations Climate Change Claim (Wai 3288).

2. Claimant counsel were directed to file summaries of briefs of evidence for those briefs totaling more than 20 pages by 18 November 2025.[1]

3. This memorandum of counsel files the summary of A51 and A51(a).

Dated: 18 November 2025

Bryce Lyall Maithili Sreen Hannah Swedlund
Counsel for the Claimants

[1] Wai 3325, #2.6.17(a).