

MAY IT PLEASE THE TRIBUNAL:

1. As directed by the Tribunal,¹ with this memorandum the Crown files statements of response to the Wai 892 amended statement of claim and the Wai 864 amended statement of claim.

3 December 2025



C Linkhorn / D Hunt
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel

¹ Wai 3555, #2.5.15 at [14] and [24].