

IN THE WAITANGI TRIBUNAL
KEI MUA I TE TARAIPUNARA

WAI 2358
WAI 2358A
WAI 914

UNDER

The Treaty of Waitangi
Act 1975

CONCERNING

The National Fresh Water
and Geothermal Inquiry

AND

A claim by Nuki Aldridge
(deceased), Ron Wihongi
(deceased), Ani Martin,
and Natalie Kay Martin
who claim on behalf of
themselves and as owners
in Lake Omapere (Wai
2358A, Sixth Claimants)

AND

A claim by Gilbert Kiharoa
Parker (deceased),
Marianne Huhana Renee
Parker, Hone Tiatoa and
Dion Parker for Waimate
Taiamai (Wai 914,
Interested Party)

MEMORANDUM OF COUNSEL

Dated: 9 December 2025

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RECEIVED

Waitangi Tribunal

9 Dec 25

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This joint memorandum of counsel is filed for:
 - a. A claim by Nuki Aldridge (deceased), Ron Wihongi (deceased), Ani Martin, and Natalie Kay Martin who claim on behalf of themselves and as owners in Lake Omapere (Wai 2358A, Sixth Claimants); and
 - b. A claim by Gilbert Kiharoa Parker (deceased), Marianne Huhana Renee Parker, Hone Tiatoa and Dion Parker for Waimate Taiamai (Wai 914, Interested Party).

(the parties)

2. Parties were directed to file corrections to the draft transcript for the discrete hearing of the stage three inquiry by 9 December 2025.¹
3. This joint memorandum attaches corrections to the draft transcript.

Dated: 9 December 2025



Bryce Lyall
Counsel



Maithili Sreen



Hannah Swedlund

¹ Wai 2358, 2.6.143 at [3].