IN THE WAITANGI TRIBUNAL	**WAI 1700** **WAI 1511**
CONCERNING	the Treaty of Waitangi Act 1975
AND **IN THE MATTER OF**	The North Eastern Bay of Plenty Inquiry
AND **IN THE MATTER OF**	Kate Keita Hudson on behalf of ngā uri o Te Waru Tamatea and Ngāi Tamatea ki Waiotahe

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MEMORANDUM OF COUNSEL

Dated this 12th day of February 2026

RECEIVED
Waitangi Tribunal
13 Feb 26
Ministry of Justice
WELLINGTON

TE WHENUA LAW

Tania Te Whenua
Principal
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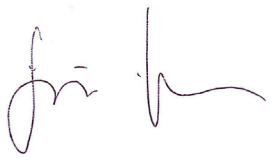
MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Wai 1511 a claim by Kate Keita Hudson on behalf of Ngā Uri o Te Waru Tamatea – Ngai Tamatea ki Waiotahe hapū in accordance with the Memorandum-Directions of his Honour Judge Doogan directing Counsel to file cross-examination bundles for hearing week seven by 12 February 2026.[1]

2. Accordingly, Counsel appends to this Memorandum for filing the index and cross examination bundle for hearing week 7 witnesses.

DATED this 12th day of February 2026



…….
Tania Te Whenua
Claimant Counsel

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Lauren Chand
Claimant Counsel

[1] Wai 1750, #2.6.43(a).