

IN THE WAITANGI TRIBUNAL

WAI 3450

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IN THE MATTER OF

The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

The Natural Resources and Environmental  
Management Kaupapa Inquiry

AND

IN THE MATTER OF

A claim by Kristi HENARE, Moana  
HENARE and Thelma CONNOR on  
behalf of the whanau and hapu of Ngāti  
Hau

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**Memorandum of Counsel**

**Dated 18 February 2026**

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**RECEIVED**

Waitangi Tribunal

*19 Feb 26*

Ministry of Justice  
WELLINGTON



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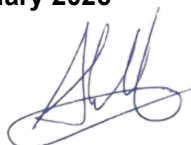
**Counsel acting: Brooke Loader | Shane Henderson | Jasper Sontier**

## MAY IT PLEASE THE TRIBUNAL

### Introduction

1. This Memorandum is filed for Kristi Henare, Moana Henare and Thelma Connor, on behalf of the whanau and hapu of Ngāti Hau.
2. By Memorandum-Directions dated 4 October 2024, his Honour Judge Armstrong directed parties seeking to participate in the WAI3450 Natural Resources and Environmental Management Kaupapa Inquiry to file new or amended statements of claim by 12pm, 24 October 2024 (“the Direction”)<sup>1</sup>.
3. Counsel acknowledges that the delayed filing falls outside of the deadline provided but submits that there is opportunity for this to be accepted with minimal prejudice to other parties.
4. Therefore counsel, respectfully seeks leave for the accompanying Statement of Claim to be accepted and registered by the Tribunal out of time.
5. Accordingly, please accept and by way of service the Statement of Claim with this accompanying Memorandum of Counsel.

**Dated at Auckland this 18<sup>th</sup> day of February 2026**



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**Brooke Loader**

**Shane Henderson**

Counsel for the Claimants

**TO:** The Registrar, Waitangi Tribunal, Wellington;  
All Counsel - Wai 3450 – The Natural Resources and Environmental Management  
Kaupapa Inquiry

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<sup>1</sup> Wai 3450 #2.5.2