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KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI  
BEFORE THE WAITANGI TRIBUNAL

WAI 3325  
WAI 2607

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IN THE MATTER OF The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF The Climate Change Priority Inquiry

AND

IN THE MATTER OF A claim by Tane Cook on behalf of himself and Mataatua District Māori Council (Wai 2607)

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MEMORANDUM OF COUNSEL

4 March 2026

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RECEIVED Waitangi Tribunal
<b>11 Mar 26</b>
Ministry of Justice WELLINGTON

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**E TE KAIWHAKAWĀ, TĒNĀ KOE.**

1. This memorandum is filed on behalf of Tane Cook on behalf of himself and the Mataatua District Māori Council (Wai 2607).
2. In accordance with memo-directions dated 6 March 2026, (Wai 3325, #2.6.22) counsel files alongside this memorandum the evidence of Dr Geoff Bertram in reply to Crown witness Rebecca Prebble, and claimant witness John Ballingall.

Dated at **Wellington** this 4 March 2026.



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Donna Hall  
**Woodward Law**  
Counsel for the Claimants



Darshini Dorn  
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