KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL **WAI 1750**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**the North-Eastern Bay of Plenty Inquiry**

MEMORANDUM OF COUNSEL FOR THE CROWN

13 March 2026

Te Tari Ture o te Karauna
Crown Law

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WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. By memorandum dated 6 March 2026, counsel sought an extension to file an update on the nature of Crown evidence to be filed for the inquiry.

2. The Tribunal has also directed the Crown to file submissions in reply to the submissions of counsel for Wai 1787 and Wai 3272 at the 31 October judicial conference, by today.[1]

3. Counsel for the Crown are working to finalise instructions in relation to each of these matters and will endeavour to file memoranda addressing them as soon as possible next week. Leave will be sought at the time of filing.

13 March 2026

C Linkhorn / D Hunt
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel

[1] Wai 1750, #2.6.54 at [10].