IN THE WAITANGI TRIBUNAL	**WAI 1750** **WAI 1511**
CONCERNING	the Treaty of Waitangi Act 1975
AND **IN THE MATTER OF**	The North Eastern Bay of Plenty District Inquiry
AND **IN THE MATTER OF**	Kate Keita Hudson on behalf of ngā uri o Te Waru Tamatea and Ngāi Tamatea ki Waiotahe hapū

MEMORANDUM OF COUNSEL FILING QUESTIONS IN WRITING FOR DRS MATTHEW CUNNINGHAM AND AROHA SPINKS

Dated this 25th day of March 2026

RECEIVED
Waitangi Tribunal
25 Mar 26
Ministry of Justice
WELLINGTON

TE WHENUA LAW

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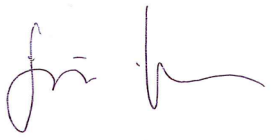
MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Wai 1511 a claim by Ms Kate Keita Hudson on behalf of Ngā Uri o Te Waru Tamatea – Ngāi Tamatea ki Waiotahe hapū.

2. In memorandum directions dated 25 September 2025, his Honour Judge Doogan directed counsel to file questions in writing by no later than 5pm, 9 April 2026.[1]

3. Accordingly, appended to this memorandum for filing are re-examination questions in writing that arose during hearing week 8 for Drs Matthew Cunningham and Aroha Spinks in relation to the 'Environmental Issues Report'.[2]

DATED this 25th day of March 2026



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Tania Te Whenua
Claimant Counsel

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Lauren Chand
Claimant Counsel

[1] Wai 1750, #2.6.43.
[2] Wai 1750, #A34.