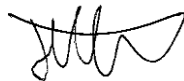


MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel (“memorandum”) is filed on behalf of Florence Karaitiana and Kim Te Tua, the named claimants of Wai 3415 (“the claimants”).
2. On 17 December 2025 His Honour Judge Isaacs released memorandum-directions which directed the claimants to file supplementary evidence covering the evidence adduced at hearing three by 30 January 2026.¹
3. Accordingly, counsel attaches alongside this memorandum:
 - a. A supplementary brief of evidence on behalf of Kim Te Tua;
 - b. Appendix A to the supplementary brief of evidence of Kim Te Tua;
 - c. A supplementary brief of evidence on behalf of Florence Karaitiana; and
 - d. Index and Appendices to the supplementary brief of evidence of Florence Karaitiana.

Dated this 30th day of January 2026 at Tāmaki-makau-rau



David Stone

Harry Clatworthy

Counsel for the claimants

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for Wai 2358 The National Freshwater and Geothermal Resources Inquiry

¹ Wai 2358 #2.6.145 at [22].