

**IN THE WAITANGI TRIBUNAL  
KEI MUA I TE TARAIPUNARA**

**WAI 3325**

**UNDER**

**The Treaty of Waitangi  
Act 1975**

**CONCERNING**

**The Climate Change  
Priority Inquiry**

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**MEMORANDUM OF CLAIMANT COORDINATING COUNSEL**

Dated: 21 April 2026

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**RECEIVED**

Waitangi Tribunal

**21 Apr 26**

Ministry of Justice  
WELLINGTON

## TĒNĀ, E TE TARAIPUNARA

1. This memorandum of coordinating counsel is filed in response to the Crown's proposed timetable for hearing week seven, filed 20 April 2026.
2. The Crown's timetable truncates the claimant's estimates of cross-examination time:

Witness	Estimated Claimant Time	Time in Timetable
Collins and Keenan	190 mins	115 mins
Collins	125 mins	100 mins
Stocks	115 mins	70 mins
Knowles and Wilson	95 mins	65 mins
Murray	170 mins	90 mins
Plume	100 mins	60 mins
Casey	100 mins	45 mins
Rogers and Hindriksen	105 mins	60 mins
Martin	110 mins	50 mins
Rawiri	160 mins	95 mins

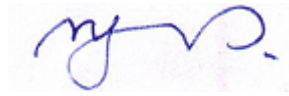
3. In the timetable, the Tribunal has only been provided with 30 minutes of questioning per witness. There are also no allowances for microbreaks.
4. Currently the timetable for hearing week eight allows for around two extra days.
5. In these circumstances, co-ordinating counsel suggest it would be the most efficient use of the Tribunal's time and resourcing to hear the evidence of Grahame Morton and Paul Stocks within hearing week eight.
6. The evidence of Mr Morton and the supplementary brief of evidence of Mr Stocks remain outstanding. This proposal would

allow for more time for claimant counsel and the Tribunal to consider this evidence, which is likely to be technical in nature.

Dated: 21 April 2026



Bryce Lyall  
Claimant Coordinating Counsel



Michael Sharp



Tania Te Whenua