

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 Waioatahe

**MEMORANDUM OF COUNSEL SEEKING EXTENSION TO FILE
AMENDED STATEMENT OF CLAIM**

Dated this 30th day of April 2026

RECEIVED

Waitangi Tribunal

30 Apr 26

Ministry of Justice
WELLINGTON

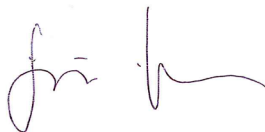


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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Wai 1511 a claim by Kate Keita Hudson on behalf of Ngā Uri o Te Waru Tamatea – Ngāi Tamatea ki Waiotaha hapū.
2. By Memorandum of Directions dated 13 April 2026, his Honour Judge Doogan directed Counsel to file the final amended statement of claim for Wai 1511 no later than 5pm, 30 April 2026.¹
3. Counsel is co-coordinating counsel in the Wai 3325 Climate Change Priority Inquiry, presently appearing in Hearing Week 7 of that Inquiry.
4. Counsel has been heavily involved in preparations for the Climate Change Inquiry along with Wai 2700 Mana Wāhine Inquiry Hearings Weeks 2 and 3 which will occur consecutively across the next two weeks.
5. Despite this, the final amended statement of claim for Wai 1511 is all but complete. However, due to concurrent commitments in the Climate Change Inquiry, it will be difficult to finalise today.
6. As such, counsel respectfully seeks leave to finalise the statement of claim and obtain instructions with the claimant community over the course of the weekend enabling counsel to file the final amended statement of claim for Wai 1511 on Monday 4 May.

DATED this 30th day of April 2026



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Tania Te Whenua
Claimant Counsel



.....
Lauren Chand
Claimant Counsel

¹ Wai 1750, #2.6.60.