

**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

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

**Dated this 4<sup>th</sup> day of May 2026**

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**RECEIVED**

Waitangi Tribunal

**4 May 26**

Ministry of Justice  
WELLINGTON

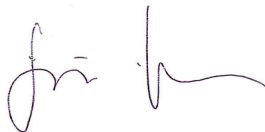


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**MAY IT PLEASE THE TRIBUNAL**

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.<sup>1</sup>
3. Due to Counsel’s involvement as co-coordinating counsel in Hearing Week 7 of the Wai 3325 Climate Change Priority Inquiry (27 April – 1 May), and preparation of evidence and cross-examination for Wai 2700 Mana Wāhine Inquiry Hearings Weeks 2 and 3 (4 – 16 May), on 30 April counsel sought leave for an extension of time 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.
4. Subsequently, a number of amendments have been identified as required in order to finalise the Amended Statement of Claim.
5. As Counsel is currently involved in the Hearing Week 2 of Wai 2700 Mana Wahine Inquiry, a further extension is respectfully sought to Monday 11 May in order to make the amendments and confirm instructions to file.
6. Leave is sought on the basis that little to no prejudice arises should leave be granted.

DATED this 4<sup>th</sup> day of May 2026



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Tania Te Whenua  
Claimant Counsel



.....  
Lauren Chand  
Claimant Counsel

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<sup>1</sup> Wai 1750, #2.6.60.