OFFICIAL

IN THE WAITANGI TRIBUNAL **Wai 3325**

IN THE MATTER OF	the Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	the Climate Change Priority Kaupapa Inquiry
BY	Awhirangi Panehina Lawrence, on behalf of herself, her whānau, and Ngā uri o Ngatau me Pomana Honetua
AND	others…

MEMORANDUM OF COUNSEL

FILING BRIEF OF EVIDENCE OF PROFESSOR ALEXANDER GILLESPIE

DATED THIS 15TH DAY OF MAY 2026

Phoenix Law Limited
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Counsel Acting: Janet Mason and Umar Abdul Kuddus
Counsel Assisting: Arabela Boatwright

RECEIVED
Waitangi Tribunal
18 May 26
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel ("MoC"):

a. is filed on behalf of the Claimants represented by Phoenix Law Limited as set out in Wai 3325, #3.2.266 ("the Claimants"); and

b. files the Brief of Evidence ("BoE") of Professor Alexander Gillespie.

2. On Thursday 27 November 2025, Professor Gillespie presented his evidence in relation to the Wai 3325 – The Climate Change Priority Inquiry.[1]

3. On Tuesday 21 April 2026, Counsel filed a Memorandum of Counsel seeking leave to file further evidence of Professor Gillespie in relation to the protections for intergenerational interests and/or rights, especially with regards to differences in tangible and intangible heritage in international law.[2]

4. On Friday 24 April 2026, Counsel received an email from the Registrar granting leave for Counsel to file the BoE of Professor Gillespie by Friday 15 May 2026, 5 pm.[3]

5. Counsel therefore files, the BoE of Professor Gillespie.

Dated this 15th day of May 2026

Janet Mason	**Umar Abdul Kuddus**	**Arabela Boatwright**
Counsel Acting	**Counsel Acting**	**Counsel Assisting**

[1] Wai 3325, #A126.
[2] Wai 3325, #3.2.315 at [3].
[3] Email dated 24 April 2026, received at 12.01 pm.