

BEFORE THE WAITANGI TRIBUNAL

WAI 3325

UNDER

the Treaty of Waitangi Act  
1975

IN THE MATTER OF

the Climate Change Priority  
Inquiry (Wai 3325)

AND

IN THE MATTER OF

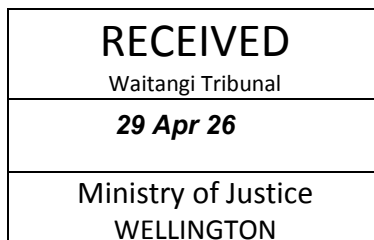
A claim by Mere Brooks, John  
Hooker, Alan Joseph Fred  
Hooker and Allen Webb for  
and on behalf of members of  
their respective hapū of  
Ngāruahine (Wai 3382).

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MEMORANDUM OF COUNSEL FILING QUESTIONS IN WRITING FOR THE  
CLIMATE CHANGE COMMISSION

Dated this 28<sup>th</sup> day of April 2026

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ANNETTE  
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**MAY IT PLEASE THE TRIBUNAL:**

1. This memorandum of counsel is filed on behalf of Wai 3382, a claim by Mere Brooks, John Hooker, Alan Joseph Fred Hooker and Allen Webb for and on behalf of members of their respective hapū of Ngāruahine.
2. Questions in writing for the Climate Change Commission are provided with this memorandum as Appendix A.
3. The relevant documents associated with those questions are provided as Appendix B.

**Dated** this 28<sup>th</sup> day of April 2026



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Annette Sykes



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Sam Vincent

Counsel for the Claimants