

I TE RŌPU WHAKAMANA
I TE TIRITI O WAITANGI

WAI 1750
WAI 1884

KEI RARO I TE MANA o te ture o te Tiriti o Waitangi 1975

I TE TAKE O te pakirehua, North-Eastern Bay of Plenty (Wai 1750)

Ā

I TE TAKE O he kereme nā Tarati Dorothy Carrington, Arihia Tuoro, Tahu Taia, Mana Pirihi, Kahu Abbot me te hapū, Ngāti Ngahere (Wai 1884)

HE MANATU RŌIA

I tēnei rā, i te 25 o Haratua 2026

RECEIVED

Waitangi Tribunal

25 May 26

Ministry of Justice
WELLINGTON



p 09 404 0953
a 91 Hupara Road, RD2 Kaikohe, Northland 0472
e admin@tukaulaw.co.nz
w www.tukaulaw.co.nz

Ngā rōia

Dr Season-Mary Downs
Chelsea Terei-Tipene
Tatijana Simon-Larsen

TĒNĀ, E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI:

1. This Memorandum of Counsel is filed on behalf of a claim filed by Tarati Dorothy Carrington for and on behalf of Ngāti Ngahere (Wai 1884).
2. On 19 May 2026, counsel filed a Memorandum of Counsel requesting time to cross-examine on the #A29 'Public Works Issues c. 1870s – 2010' report, in particular in relation to the impact of public works law and policy on land loss in the inquiry district, of particular relevance to Ngāti Ngahere.
3. Counsel seek only to cross-examine Heather Bassett and Richard Kay, the authors of the #A29 report, during Hearing Week 9 and therefore respectfully request leave to attend the hearing and complete cross-examination via AVL.

I TĒNEI RĀ, i Tūranganui-ā-Kiwa, te rā 25 o Haratua 2026



Dr Season-Mary Downs/Chelsea Terei-Tipene/Tatijana Simon-Larsen
Ngā rōia mo Ngāti Ngahere