KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL **WAI 2358**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**the National Fresh Water and Geothermal Resources Inquiry**

MEMORANDUM OF COUNSEL FOR THE CROWN

4 Hepetema | September 2026

Te Tari Ture o te Karauna
Crown Law

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RECEIVED
Waitangi Tribunal
4 Sep 26
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. The Crown respectfully seeks a short further extension to file mini-opening submissions ahead of hearing four, to 5pm, Tuesday 8 September.

2. The Crown apologises for the further delay in filing these submissions.

4 Hepetema | September 2026

T C Stephens KC / G Seeley
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal

AND TO: Claimant Counsel