

**IN THE WAITANGI TRIBUNAL****WAI 1750****WAI 1827****WAI 1781****IN THE MATTER** of the Treaty of Waitangi Act 1975**AND****IN THE MATTER** of claims in the North-Eastern Bay of Plenty Historical Inquiry (Wai 1750)**AND** a claim made by Rachel Maunganui Wolfgramm and Tania Haerekitera Wolfgramm, on behalf of the descendants of Rangihaerepō (Wai 1827)**AND** a claim by Tracy Hillier and Rita Wordsworth on behalf of themselves and the hapū of Ngai Tamahaua (Wai 1781)

---

**MEMORANDUM OF COUNSEL SEEKING EXTENSION OF TIME FOR  
SUBMISSIONS ON THE PRE-CASEBOOK DISCUSSION PAPER****Dated 30 March 2020**

---

 **WACKROW WILLIAMS & DAVIES LTD**  
BARRISTERS & SOLICITORS  
Level 14, 48 Emily Place  
Po Box 461  
DX CP 20503  
AUCKLAND  
T K WILLIAMS / C LINSTEAD-PANOHO / R J CLARK  
Ph. (09) 379 5026, Fax (09) 377 6553  
E mail: [coral@wwandd.co.nz](mailto:coral@wwandd.co.nz) / [raewyn.clark@wwandd.co.nz](mailto:raewyn.clark@wwandd.co.nz)

**RECEIVED**

Waitangi Tribunal

**31 Mar 2020**Ministry of Justice  
WELLINGTON

## MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the above named claimants.
2. This Memorandum is filed in response to the Memorandum-Directions #2.5.10, dated 4 March 2020, where the Presiding Officer appended for review the pre-casebook research discussion paper. The Presiding Officer invited parties to file any submissions in response by no later than **midday, Friday 3 April 2020**.
3. Due to the substantial disruption to working conditions caused by the current Covid-19 Lockdown, counsel respectfully seeks further time to review and consider the discussion paper and seek instructions from claimants who are also impacted.
4. Counsel is also cognisant that the Easter break is due to occur on 10-14 April 2020 which further impacts counsel and the claimants' ability to meaningfully engage with the discussion paper.
5. Counsel therefore seeks an extension of time to **30 April 2020** to provide a response to the Tribunal.
6. It is noted that other than the proposed filing of the Raupatu scoping report, there are no other major milestones scheduled in April or May and therefore it is submitted the Tribunal and parties will not be prejudiced by the extension sought.

Dated at Auckland this 30 March 2020



Coral Linstead-Panoho / Raewyn Clark

**Counsel for the Claimants**