IN THE WAITANGI TRIBUNAL
KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI

WAI 3327

WAI 2959

KEI RARO I TE MANA O	te ture o Tiriti o Waitangi 1975
Ā	
I TE TAKE O	te ruku tātari ohotata te reo Māori i te Kāwanatanga (Wai 3327)
Ā	
I TE TAKE O	tētahi kerēme nā Druis Barrett mā te Ropu Wahine Maori Toko i te Ora/ the Maori Women's Welfare League Incorporated, its members, and all wāhine Māori of Aotearoa (Wai 2959)

MEMORANDUM OF COUNSEL ON BEHALF OF TE ROPU WAHINE TOKO I TE ORA | MAORI WOMEN'S WELFARE LEAGUE

I tēnei rā, i te rā 17 o Mei 2024

RECEIVED
Waitangi Tribunal
17 May 24
Ministry of Justice
WELLINGTON

This document is filed by: -

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Druis Barrett and Te Ropu Wahine Maori Toko i te Ora/the Maori Women's Welfare League Inc (**the League**).

Evidence for the League

2. On 13 May 2024, his Honour Judge Williams directed that the time for claimants and interested parties to file evidence is extended to 5pm Wednesday 15 May 2024.[1]

3. Counsel filed Briefs of Evidence for Dr Hope Tupara, Associate Professor Mere Skerrett, Te Ao Marama Maaka, and Hana Mereraiha Skerrett-White respectively within the prescribed timeframe.

4. On 15 May 2024, Counsel sought an extension to 5pm Friday 17 June 2024 to file evidence for the following witnesses:

    a. Dame Iritana Tawhiwhirangi

    b. Teina Boasa-Dean

    c. Phillecity Ngarangione

    d. Ngawaiata Evans

5. We acknowledge receipt of email confirmation today, 17 May 2024 that the extension sought has been granted.[2]

6. Counsel **encloses** with this memorandum for filing an unsigned Brief of Evidence for Dame Iritana Tawhiwhirangi. A signed copy will be filed as soon as possible.

7. Briefs of Evidence for the remaining witnesses have been drafted and we are awaiting final approval from the witnesses before filing same.

8. Unfortunately, due variously to the remaining witnesses contracting COVID, bereavement leave, and work commitments, we have been unable to meet with each to finalise the documents before 5pm today, despite our best endeavours to do so.

9. In light of the above, we respectfully seek a short extension to 5pm on Monday 20 May 2024 to file the remaining Briefs of Evidence, noting however we will use our

[1] Email from the Registrar on 13 May 2024, granting extension of time sought by claimant counsel and interested parties

[2] Email from the Registrar on 17 May 2024, granting extension of time sought by counsel for Wai 2959

best endeavour to file the documents as quickly as possible.

10. We submit that no prejudice will accrue to other parties should the extension be granted.

Availability of witnesses to present evidence

11. In earlier memorandum-directions, his Honour Judge Williams confirmed that if parties wish to present particular evidence at the hearing, they should file submissions to this effect in a covering memorandum alongside their evidence. [3]

12. Noting the limited hearing time available, counsel does not seek hearing time to present oral evidence on behalf of the League, who are an interested party in this proceeding.

13. If, however, the Tribunal wishes to hear from the witnesses who have provided evidence on behalf of the League, or they are required for cross examination, we confirm that the witnesses are willing and able to do so.

I TĒNEI RĀ i Tāmaki Makaurau i te rā 17 o Mei 2024

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Amy Chesnutt / Alisha Castle
Ngā roia mō te Kaikerēme

[3] Memorandum-directions #2.5.6