I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI	**WAI 3327**
IN THE WAITANGI TRIBUNAL	**Wai 892** **Wai 762** **Wai 861** **Wai 2063** **Wai 3096** **Wai 1886** **Wai 2206** **Wai 2743** **Wai 1531** **Wai 2890** **Wai 3131** **Wai 2394** **Wai 1968** **Wai 2869** **Wai 2671** **Wai 2382** **Wai 2778** **Wai 2838**
KEI RARO I TE MANA O	te ture o te Tiriti o Waitangi Act 1975
Ā	
I TE TAKE O	Te Reo I te Kāwanatanga Ruku Tātari Ohotata/ Te reo in the Public Sector Urgent Inquiry (Wai 3327)

MEMORANDUM OF COUNSEL FILING BUNDLE OF DOCUMENTS REFERENCED IN JOINT EVIDENCE OF PROFESSORS MICHAEL PLANK AND RACHAEL KA'AI-MAHUTA

Dated: 6th of June 2024

TamakiLegal
Barristers & Solicitors

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Waitangi Tribunal
6 Jun 24
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

Introduction

1. This Memorandum of Counsel is filed by counsel on behalf of the following interested parties:

    a. David Hawea, for and on behalf of the Hawea whānau and Te Whānau a Kai iwi (Wai 892);

    b. Jasmine Cotter-Williams, for and on behalf of her whānau and Ngāti Taimanawaiti iwi (Wai 2063);

    c. Stephanie August, for and on behalf of the late Robert Charles William James Farrar and her whānau (Wai 3096);

    d. Robert Gabel, for and on behalf of Ngāti Tara of Ngāti Kahu (Wai 1886);

    e. April Grace, for and on behalf of her whānau, Ngā Wahapū o Te Rarawa, Ngāti Whātua and Ngāpuhi Nui Tonu (Wai 2206);

    f. Annette Hale, for and on behalf of the Wikotu whānau of Te Upokorehe (Wai 2743);

    g. Te Enga Harris and Lee Harris, for and on behalf of the Wiremu Hemi Harris and Meri Ōtene whānau, and on behalf of members of Ngāti Rangi, Ngāti Here, Ngāi Tūpoto, Ngāti Hōhaitoko, Ngāti Kōpuru, Te Rarawa and Ngāti Uenuku (Wai 1531);

    h. Tasilofa Huirama, for and on behalf of the Huirama whānau and members of Ngāti Ueoneone and Ngāti Tautahi of Ngapuhi (Wai 2890);

    i. Te Urunga Evelyn Aroha Kereopa, for and on behalf of the Kereopa whānau and members of Te Ihingārangi, hapū of Ngāti Maniapoto (Wai 762);

j. Richard Nathan, for and on behalf of the Mangakahia Hapū Claims Collective (Wai 861);

k. Diane Marie Paekau for and on behalf of her whanau and members of Ngāti Hounuku, Ngāti Houa, Ngāti Poua, Ngāti Mahuta, Ngāti Te Ata and Ngāti Whātua (Wai 3104);

l. John Pikari, for and on behalf of the descendants of Hone Karahina and members of the hapū of Te Uri o Hua and Ngāti Torehina (Wai 2394);

m. Rueben Taipari Porter, for and on behalf of the hapū of Ahipara (Wai 1968);

n. Audrey Okeroa Rogers, for and on behalf of her whānau and members of Ngāti Koheriki (Wai 2869);

o. Jane Stevens, for and on behalf of her whānau and Ngāi Tahu iwi (Wai 2671);

p. Violet Eva Walker, for and on behalf of her whānau and members of Ngāti Rangi o Waiapu ki Tawhiti and Ngāti Kahu ki Whangaroa (Wai 2382);

q. Kahura James Watene and Elizabeth Watene, for and on behalf of Ngāi Tukōkō and Ngāti Moe of Rangitāne me Ngāti Kahungunu (Wai 2778); and

r. Michael Williams and Jessica Williams, for and on behalf of their whānau, and members of Ngaitūpango, hapū of Ngāpuhi (Wai 2838).

(the "**interested parties**")

2. On 15 May 2024, counsel filed the following briefs of evidence in support of the interested parties:

   a. Signed Joint Brief of Evidence of Professors Michael Plank and Rachael Ka'ai-Mahuta[1]; and

   b. Signed Brief of Evidence of Professor Emeritus Robert Phillipson.[2]

3. Counsel consider that the documents referenced in the Joint Brief of Evidence of Professors Michael Plank and Rachael Ka'ai-Mahuta may be of assistance to the Tribunal in this inquiry.

4. Accordingly, counsel **attach** for filing a bundle of documents that are referenced in the Joint Brief of Evidence of Professors Michael Plank and Rachael Ka'ai-Mahuta, that are not yet on the Record of Inquiry.

5. Counsel would also be happy to provide the documents referenced in the Brief of Evidence of Professor Phillipson if the Tribunal request this.

Dated at **Tāmaki Makaurau** this **6th** day of **June 2024**

Darrell Naden
Counsel Acting

Victoria Tumai
Counsel Acting

Sally Rickard
Counsel Acting

Tui Henry
Counsel Acting

[1] M Plank, R Ka'ai-Mahuta, *Brief of Evidence* dated 15 May 2024, Wai 3327, #A17
[2] R Phillipson, *Brief of Evidence* dated 15 May 2024, Wai 3327, #A16