

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL

Wai 3300

KEI RARO I TE MANA O

te ture o te Tiriti o Waitangi 1975

Ā

I TE TAKE O

te pakirehua o Tomokia ngā
Tatau o Matangireia
Constitutional Kaupapa Inquiry
(Wai 3300)

MEMORANDUM OF COUNSEL FILING REPLY SUBMISSIONS FOR THE
INTERESTED PARTIES

Dated 15 July 2024

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Barristers & Solicitors

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Waitangi Tribunal

15 Jul 24

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This Joint 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 Rangī, 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 Ngāpuhi (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 3131);
- 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).

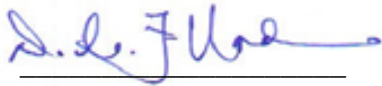
(the “**interested parties**”)

- 2. By way of a Memorandum-Directions dated 3 July 2024, her Honour, Chief Judge Fox, directed that claimant and interested parties file joint reply submissions by 5pm, 15 July 2024.¹

¹ Waitangi Tribunal, *Memorandum-Directions of Chief Judge Dr C L Fox regarding Crown Closing Submissions*, dated 3 July 2024, Wai 3300, #2.6.9, at [8].

3. Accordingly, this memorandum of counsel files with its joint reply submissions on behalf of the interested parties.

Dated at Tāmaki Makaurau this 15th day of July 2024



Darrell Naden
Counsel Acting



Victoria Tumai
Counsel Acting



Lauren Oliver
Counsel Acting



Sally Rickard
Counsel Acting