

**BEFORE THE WAITANGI TRIBUNAL**

**WAI 3300  
WAI 1194  
WAI 1212  
WAI 2494  
WAI 2872**

**IN THE MATTER OF  
AND**

the Treaty of Waitangi Act 1975

**IN THE MATTER OF**

Tomokia ngā tatau o Mātangireia (WAI 3300)

**AND**

**IN THE MATTER OF**

a claim by **Colleen Skerrett-White, Timitapo Hohepa, and Te Ariki Derek Morehu** on behalf of **Ngāti Te Rangiunuora** who are supported by **Ngāti Pikiao (Wai 1194 and Wai 1212)**

**AND**

**IN THE MATTER OF**

a claim by **Pita Tipene, Moana Maniapoto, George Laking, Veronica Tawhai, Donna Kerridge and India Logan Riley** on behalf of **Ngā Toki Whakarururanga (WAI 3342)**

**AND**

**IN THE MATTER OF**

a claim by **Donna Awatere-Huata of Ngāti Porou, Ngāti Whakaue and Ngāti Hine**, on behalf of herself and all Māori (WAI 2494)

**AND**

**IN THE MATTER OF**

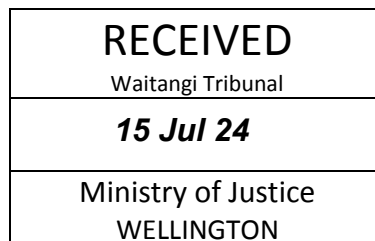
a claim by **Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuia Hata (WAI 2872)**

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**MEMORANDUM OF COUNSEL FILING JOINT REPLY SUBMISSIONS**

Dated on this 15<sup>th</sup> day of July 2024

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barristers & solicitors

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## TĒNĀ E TE TARAIPUNARA

### Introduction

1. This Memorandum of Counsel is filed on behalf of the following claims and respective claimants:
  - a) **Wai 3342**, a claim by Pita Tipene, Moana Maniapoto, George Laking, Veronica Tawhai, Donna Kerridge and India Logan Riley on behalf of Ngā Toki Whakarururanga
  - b) **Wai 1194/1212**, a claim by Colleen Skerrett-White, Timitapo Hohepa, and Te Ariki Derek Morehu on behalf of Ngāti Te Rangiuuora who are supported by Ngāti Pikiaio;
  - c) **Wai 2494**, a claim by Donna Awatere-Huata of Ngāti Porou, Ngāti Whakaue and Ngāti Hine, on behalf of herself and all Māori; and
  - d) **Wai 2872**, a claim by Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuia Hata.

(“the Claimants”)

### Background

2. The Wai 3342 and Wai 1194/1212 Claimants have been granted full applicant party status in the Wai 3300 Urgent Inquiry into the Proposed Treaty of Waitangi Principles Bill, and the Wai 2494 and Wai 2872 Claimants have been granted interested party status.<sup>1</sup>
3. In Memorandum-Directions dated 20 May 2024, Her Honour, Kaiwhakawā Matua Dr Fox directed claimant and interested party closing submissions to

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<sup>1</sup> Wai 3300, #2.5.22 *He Pānui Whakahau a Te Kaiwhakawā Matua* dated 17 Paengawhāwhā 2024.

be filed by 5pm Wednesday 22 May 2024<sup>2</sup>, to which counsel filed accordingly.<sup>3</sup>

4. In Memorandum-Directions dated 3 Hōngongoi 2024, Kaiwhakawā Matua Dr Fox directed the Crown to file closing submissions by 9 July 2024 and claimants and interested parties to file submissions in reply by 15 July 2024.<sup>4</sup>

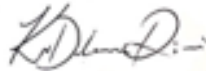
### **Filing Joint Reply Submissions**

5. This Memorandum of Counsel files with it the submissions in reply to Crown closing submissions<sup>5</sup> on behalf of the Claimants.

**DATED** at Rotorua on this 15<sup>th</sup> day of July 2024



Annette Sykes



Kalei Delamere-Ririnui



Maia Te Hira

**Counsel for Claimants**

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<sup>2</sup> Wai 3300, #2.6.5 *Memorandum-directions of Chief Judge Dr C L Fox regarding Cabinet paper on Treaty Principles Bill and timeframes for filing closing submissions* dated 20 May 24 at [26(a)].

<sup>3</sup> Wai 3300, #3.3.21 *Joint closing submissions* dated 22 May 2024.

<sup>4</sup> Wai 3300, #2.6.9 *Memorandum-Directions of Chief Judge Dr C L Fox regarding Crown closing submissions* dated 3 Hōngongoi 2024.

<sup>5</sup> Wai 3300, #3.3.23 *Closing submissions of the Crown* dated 9 July 2024.