

**IN THE WAITANGI TRIBUNAL**

**Wai 2575**    **Wai 1307**  
**Wai 2850**  
**Wai 120**  
**Wai 179**  
**Wai 2849**  
**Wai 1940**

**IN THE MATTER OF**    the Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF**    the Health Services and Outcomes  
Kaupapa Inquiry

**BY**    Mane Grant Tahere, Chairperson of  
Te Rūnanga-Ā-Iwi Ō Ngāpuhi,  
Chrisandra Iti Rana Joyce, Deputy  
Chairperson of Te Rūnanga-Ā-Iwi  
Ō Ngāpuhi, and Hone Sadler,  
Kaumatua, on behalf of themselves,  
and the whānau, hapū and iwi who  
constitute te Whare Tapu o Ngāpuhi

**AND**    others...

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**MEMORANDUM OF COUNSEL REQUESTING EXTENSION TO FILE  
CLOSING SUBMISSIONS**

**Dated: 15 October 2024**

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**Counsel Acting:** Janet Mason

**Counsel Assisting:** Luke Evison

**RECEIVED**

Waitangi Tribunal

**15 Oct 24**

Ministry of Justice  
WELLINGTON

## **MAY IT PLEASE THE TRIBUNAL:**

- 1.** This Memorandum of Counsel (“MoC”):
  - a.** is filed on behalf of:
    - i.** Moerangi Potiki, on behalf of Te Rūnanga o Ngāti Whakaue Incorporated, for and on behalf of Ngāti Whakaue ki Maketu Hapū;
    - ii.** Ruiha Te Matekino Collier, and Rihari Richard Takuirā Dargaville on behalf of themselves, and Ngāti Kawau Iti;
    - iii.** Jane Mihingarangi Ruka, on behalf of the Grandmother Council of the Waitaha Nation, including the three hapū of Ngāti Kurawaka, Ngāti Rakaiwaka, and Ngāti Pakauwaka;
    - iv.** Rhonda Aorangi Kawiti, on behalf of the Kawiti Marae Committee, the Kawiti Whānau, and their descendants of Ngāti Hine, Ngāti Manu, Te Kapotai, Ngāti Rāhiri, Ngāti Rangī, Ngāitewake and Ngāpuhi iwi;
    - v.** Mane Grant Tahere, Chairperson of Te Rūnanga-Ā-Iwi Ō Ngāpuhi, Chrisandra Iti Rana Joyce, Deputy Chairperson of Te Rūnanga-Ā-Iwi Ō Ngāpuhi, and Hone Sadler, Kaumatua, on behalf of themselves, and the whānau, hapū and iwi who constitute te Whare Tapu o Ngāpuhi;
    - vi.** Awhirangi Panehina Lawrence, on behalf of herself, her Whānau, and Ngā Uri o Ngātau me Pomana Honetua; (parties listed above together called “the Claimants”) and
  - b.** respectfully seeks an extension until 5 pm, Monday 21 October 2024 to file Closing Submissions for the Te Aka Whai Ora Priority Hearing, as directed by the Tribunal.
  
- 2.** In the Memorandum Directions dated 1 October 2024, Counsel was directed to file closing submissions by 14 October 2024.<sup>1</sup>

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<sup>1</sup> Wai 2575, #2.6.191 at [55].

3. The extension is sought for the following reasons:
  - a. Counsel has been engaged in representing a significant number of claimants in the Health Services Inquiry (Disability Phase), in the Stage 1(b) Whangarei MACA High Court proceedings, and the Constitutional Kaupapa Inquiry;
  - b. closing Submissions for the Health Services Disability Phase were due on 23 September 2024, the Stage 1(b) Whangarei MACA High Court proceedings were due on 7 October 2024, and the Constitutional Kaupapa were due on 14 October 2024; and
  - c. as a result, Counsel has not been able to finalise instructions and file Closing Submissions for the Te Aka Whai Ora Priority Hearing in accordance with instructions from Claimants.
4. Counsel therefore respectfully seeks leave for an extension to **5 pm Monday, 21 October 2024** to file closing submissions.
5. Counsel sincerely apologises for any inconvenience and submits that little to no prejudice would arise to other Claimants due to the late filing.

**Dated 15 October 2024**



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**Janet Mason**  
**Counsel Acting**