

IN THE WAITANGI TRIBUNAL

WAI 2575

WAI 3307

IN THE MATTER The Treaty of Waitangi Act 1975

AND

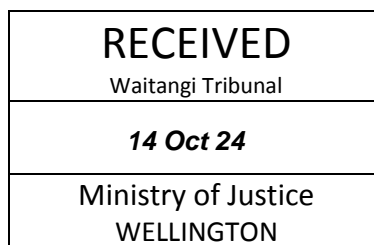
IN THE MATTER of the Health Services and Outcomes
Kaupapa Inquiry (Wai 2575)

AND

IN THE MATTER of a claim to the Waitangi Tribunal by Janice
Kuka and Lady Tureiti Moxon in respect of the
30 June 2024 commencement of the Pae Ora
(Disestablishment of Maaori Health Authority)
Amendment Act 2024

MEMORANDUM OF COUNSEL

DATED 14 OCTOBER 2024



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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of the claimants in response to the Tribunal memorandum-directions dated 1 Oketopa 2024, which allows claimants to file any closing submissions by today.¹

2. On 3 September 2024 counsel filed a substantive update on to opening submissions dated 20 February 2024.² The claimants seek that these are treated as their closing submissions as at this stage they have nothing further to add. The claimants will likely take the opportunity also afforded by the memorandum-directions to file reply submissions on 25 October 2024.

Date: 14 October 2024



R N Smail/
Counsel for Wai 3307

¹ Wai 2575, #2.6.191 – Memorandum-directions of Judge D Stone concerning next steps in the Te Aka Whai Ora Priority Inquiry dated 1 Oketopa 2024.

² Wai 2575, #3.3.095 and #3.3.095(a).