

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 2575

IN THE WAITANGI TRIBUNAL

KEI RARO I TE MANA O

te ture o te Tiriti o Waitangi 1975

IN THE MATTER OF

the Treaty of Waitangi Act 1975

ME

AND

I TE TAKE O

te pakirehua Wai 2575 mō ngā kerēme
e pā ana ki te Health Services me
Outcomes

IN THE MATTER OF

the Health Services and Outcomes
Kaupapa Inquiry (Wai 2575)

ME

AND

I TE TAKE O

te whakārotau whakahaerenga mō ngā
kerēme e pā ana ki te Te Aka Whai Ora
disestablishment

IN THE MATTER OF

the Priority Hearing into the claims
relating to Te Aka Whai Ora
disestablishment

**MEMORANDUM OF COUNSEL FILING JOINT CLOSING SUBMISSIONS FOR
THE PRIORITY HEARING INTO THE DISESTABLISHMENT OF TE AKA WHAI
ORA (PROCEDURAL ELEMENTS)**

Dated: 14 October 2024

TamakiLegal
Barristers & Solicitors

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Waitangi Tribunal

14 Oct 24

Ministry of Justice

WELLINGTON

MAY IT PLEASE THE TRIBUNAL

Introduction

1. This memorandum of counsel is filed on behalf of the following Claimants:
 - a. Evelyn Kereopa, on behalf of herself, the Kereopa whānau and members of Te Ihingārangi, Wai 762.
 - b. Richard John Nathan on behalf of the Mangakāhia Hapū claims collective, Wai 861.
 - c. Esme Warati Sherwin, on behalf of herself, the late Emma Gibbs-Smith, and her whānau as members of Nga Whānau o Waitangi Horotutu me Taputaputa o Pahi, Ngāti Kawa, Ngāti Rāhiri, and Ngare Raumati, Wai 1477.
 - d. Te Enga Harris and Lee Harris, on behalf of themselves, and the Harris whānau, Wai 1531.
 - e. April Grace on behalf of herself, the late Charlene Walker-Grace, her whānau, Ngā Wahapū o Te Rarawa o Kohai Settlement, and Te Hokingamai e te iwi o Ngāti Whātua Ngāpuhi nui tonu and members of Otangarei Marae, Wai 2206.
 - f. Violet Nathan and Maringi Te Aroha Kalva Emily Pia Broughton on behalf of themselves and their whānau, Wai 2217.
 - g. Bryce Aldridge, Mark Renata Smith and Russell Owen-Smith on behalf of Ngāti Pakahi, Wai 2377.
 - h. Jane Stevens on behalf of the late Nicholas Taiaroa Macpherson Stevens, her whānau, Ngai Tahu and all Māori suffering from mental illness, Wai 2671.
 - i. Susan Taylor on behalf of the late Georgia-May Morgan MacBeath, her whānau and all Māori suffering from mental illness, Wai 2729.
 - j. John Kearns and Maeva Kearns, on behalf of the Kearns whānau, Wai 2747.

- k. Michael John Williams and Jessica Williams, on behalf of themselves, their whānau and members of Ngaitūpango, Wai 2776.
- l. Kahura Watene, on behalf of himself and the Watene whānau, Wai 2778.
- m. Tasilofa Huirama on behalf of the late Ziporah Grace Huirama, her whānau, as members of Ngāti Ueoneone and Ngāti Tautahi of Ngapuhi, Wai 2890.
- n. Malcolm Kingi, on behalf of himself and Ngāi Tahu ō Mōhaka Waikare, Wai 2894; and
- o. Stephanie August on behalf of the late Robert Charles William James Farrar, and her whānau, and all Māori rangatahi suffering from mental illness, Wai 3096.

(“Claimants”)

- 2. This memorandum is also filed on behalf of the following Interested Parties:
 - a. Robert Gabel, on behalf of Ngāti Tara, Wai 1886.
 - b. Jasmine Cotter-Williams, on behalf of herself and her whānau, Wai 2063; and
 - c. Violet Walker on behalf of herself, the late Nuki Aldridge, her whānau and members of Ngāti Uru and Te Tahawai hapū, Wai 2382.

(“Interested Parties”)

- 3. By way of Memorandum-Directions dated 1 Oketopa 2024, His Honour Judge Stone directed that all parties are to file closing submissions by **5pm 14 October 2024**.¹
- 4. Accordingly, we **attach** for filing, and by way of service:

¹ Waitangi Tribunal, *Memorandum-Directions of Judge D Stone Concerning Next Steps in the Te Aka Whai Ora Priority Inquiry* dated 1 Oketopa 2024, Wai 2575, #2.6.191 at [55].

- a. Joint Closing Submissions of the Claimants and Interested Parties dated 14 October 2024.
- b. Index to the Tamaki Legal Bundle of Authorities; and
- c. Appendix A: Bundle of Authorities to Tamaki Legal Closing Submissions.

DATED at TĀMAKI MAKAURAU this 14th day of October 2024



Stephanie Roughton / Cheri-Rose Smith
Counsel Acting