

In the Waitangi Tribunal

**Wai 2575
Wai 3216
Wai 2123**

In the Matter

of the Treaty of Waitangi Act 1975

And in the Matter

**the Health Services and Outcomes
Kaupapa Inquiry (Disability Phase
Stage Two)**

And in the Matter

**a claim by Merepeka Raukawa-
Tait on behalf of her whaanau,
hapuu, iwi, whaanau whaanui, and
whaangai (Wai 3216)**

And in the Matter

**a claim by Francis Mclaughlin on
behalf of THE MIGHTY
MONGREL MOB, their whaanau,
hapuu, iwi, whaanau whaanui, and
whaangai (Wai 2123)**

**MEMORANDUM OF COUNSEL REQUESTION ATTENDANCE
VIA AVL FOR DISABILITY PHASE STAGE TWO**

DATED AT TOKOROA THIS 29 DAY OF NOVEMBER 2024



Counsel's Acting: Ārama Ngāpō / Te Karu o Whakatihi Brown / Hussain Sabori

NL Lawyers-Barristers & Solicitors

Tokoroa Office

58 Bonaly Street

PO Box 518,

Tokoroa, 3444

P 07 8867540

E arama@nll.co.nz

E waitangi@nll.co.nz

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Waitangi Tribunal

29 Nov 24

Ministry of Justice
WELLINGTON

**MEMORANDUM OF COUNSEL REQUESTION ATTENDANCE
VIA AVL FOR DISABILITY PHASE STAGE TWO**

May it please the tribunal

1. This Memorandum of Counsel is filed on behalf of;
 - a. Merepeka Raukawa-Tait (Wai 3216); and
 - b. Francis McLaughlin (Wai 2123) (“the Claimants”)
2. In correspondence with the Waitangi Tribunal on 20 November 2024, our firm confirmed our attendance in person on behalf of the Claimants for the Disability phase, stage two of the Health Services and Outcomes Kaupapa Inquiry.
3. Counsel is scheduled to appear on behalf of the Claimants on Monday 2 December 2024 to present oral closing submissions.
4. As lead Counsel is currently engaged in hearings across different jurisdictions and has ongoing commitments that coincide with the disability hearing week, Counsel is no longer able to attend the hearing in person without compromising other obligations.
5. Therefore, Counsel respectfully seeks leave to appear via Audio-Visual Link (AVL) instead of attending in person. Counsel submits that attending remotely will still allow for full engagement in the hearing. This will enable Counsel to effectively present the oral closing submissions on behalf of the Claimants without disruption.
6. Counsel apologises for the short notice and respectfully submits that if leave is granted, no prejudice will arise to the parties involved, or the proceedings.

Dated at Tokoroa this 29 November 2024



**Ārama Ngāpō
Counsel for the Claimants**



Te Karu o Whakatihi Brown



Hussain Sabori