

IN THE WAITANGI TRIBUNAL

**WAI 2575
WAI 2672**

IN THE MATTER OF

The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

The Health Services and Outcome
Inquiry (Wai 2575)

AND

IN THE MATTER OF

A claim by Donna Washbrook (Wai
2672)

**MEMORANDUM OF COUNSEL
29 NOVEMBER 2024**

RECEIVED

Waitangi Tribunal

29 Nov 24

Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Donna Washbrook, the named claimant for Wai 2672.
2. Whilst preparing for the closing submissions hearing week it has come to counsels attention that some of the document references in the Wai 2672 closing submissions¹ footnotes were incorrectly recorded.
3. For completeness counsel note the following references require updating:
 - a) Footnote 6 and 7 should state #4.1.11;
 - b) Footnote 8- Andrea Lamont evidence should state #I10;
 - c) Footnote 27 should state #L21(f); and
 - d) Footnote 28 should state #L12(a).
4. As the closing submissions have already been translated counsel request for this memorandum of counsel to be filed on the record of inquiry alongside the Wai 2672 closing submissions and suggest it be given record of inquiry number #3.3.112(b). Counsel apologise for any inconvenience this may cause.

DATED at Auckland this 29th day of November 2024



David Stone

Catherine Leauga

Paige Joy

Counsel for the claimant

TO: The Registrar, Waitangi Tribunal; Crown Law Office; and those on the notification list for the Wai 2575 Health Inquiry.

¹¹ Wai 2575 #3.3.112.