

**KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL**

**WAI 3300
WAI 1781**

IN THE MATTER OF

Tomokia ngā tatau o Matangireia the
Constitutional Kaupapa Inquiry (Wai 3300)

AND

a claim by Tracy Hillier and Rita Wordsworth
on behalf of themselves and the hapū of
Ngai Tamahaua (Wai 1781)

MEMORANDUM OF COUNSEL INDICATING INTENTION TO PARTICIPATE

DATED 3rd December 2024



 **WACKROW PANOHO**
& ASSOCIATES

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MAY IT PLEASE THE TRIBUNAL:

1. This memorandum is filed on behalf of Tracy Hillier and Rita Wordsworth on behalf of themselves and the hapū of Ngai Tamahaua for Wai 1781 (the “Claimants”).
2. In Memorandum-Directions dated 1 October 2024, Her Honour Judge Fox provided a preliminary list of participating claims and directed claimant counsel to indicate their participation in the Wānanga-a-Rohe and wider phase of this Inquiry by 5pm, 16 October 2024.¹
3. The Wai 1781 Claim was not listed in the preliminary list of claims participating in this Inquiry.² However, Counsel have recently received instructions that the claimants wish to participate in both the wānanga and wider phase of this Inquiry.
4. Due to the claimants’ participation within a significant number of other inquiries and in Supreme Court proceedings, the claimants were not able to provide instructions until very recently. Counsel therefore apologise for the late filing of this memorandum, and respectfully seek leave for the same.
5. The claimants’ preference is for the eastern Wānanga-a-Rohe to be held in Whakatāne due to the current health needs of the claimants. It is for this reason that counsel cannot definitely indicate whether the claimants will participate in the eastern Wānanga-a-Rohe until a location is set down.
6. An amended statement of claim is currently being finalised and will be filed in due course.

Dated at Tāmaki Makaurau this 3rd day of December 2024



Raewyn Clark / Josi Witehira

Counsel for the Claimants

¹ Wai 3300, #2.6.019, at [15].

² Wai 3300 #2.6.019(b).