

IN THE WAITANGI TRIBUNAL

**WAI 3300
WAI 2797**

IN THE MATTER OF

The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

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

AND

IN THE MATTER OF

A claim by Te Rangikaiwhiria
Kemara on behalf of Ngaa Hapuu
Maha O Maniapoto (Wai 2797)

MEMORANDUM OF COUNCIL

DATED 11 OCTOBER 2024

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Waitangi Tribunal

14 Oct 24

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Te Rangikaiwhiria Kemara on behalf of himself and on behalf of the hapū of Wai 2797, Ngaati Kahumoana of Waikaawau, Ngaati Tuwaikoea of Ngararahae, the descendants of Puukauae, Ngaati Maahuri and Ngaati Werawera of Marokopa, Ngaati Kahinga, and Ngaati Tauhunu, known collectively as Ngaa Hapuu Maha O Maniapoto (‘the Claimants’).
2. An amended statement of claim and brief of evidence on behalf of the claimant is filed alongside this memorandum.
3. The Wai 2797 claim has previously been heard in a number of other inquiries including, most recently, the Wai 3400 Marine and Coastal Area (Takutai Moana) Act Coalition Changes Urgent Inquiry.
4. Upon review of the scope of the Wai 3300 Inquiry, it is apparent that the Wai 2797 statement of claim also falls within the scope of the Wai 3300 Inquiry.
5. Accordingly, counsel seek leave for the Wai 2797 claim to be aggregated to the Wai 3300 Inquiry.
6. Counsel understands that parties were instructed to file for eligibility by 18 April 2024.¹ Counsel apologises and seeks leave for this late filing, which reflects the particularities of the constitutional issues in question having arisen since the deadline. Counsel submit no prejudice accrues to any party in the matter should the leave sought be granted.

Dated this 11th day of October at Tāmaki Makaurau



Charl Hirschfeld

Counsel for the claimant

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for Wai 3300 Tomokia ngā tatau o Matangireia: the Constitutional Kaupapa Inquiry.

¹ Wai 3300, #2.5.17