In the Waitangi Tribunal	**Wai 3500** **Wai 3314** **Wai 3319** **Wai 3256** **Wai 3331** **Wai 3378** **Wai 3377**
In the Matter	**of the Treaty of Waitangi Act 1975**
And in the Matter	**the Identity and Culture Kaupapa Inquiry (Wai 3500)**
And in the Matter	**of a claim by Merepeka Raukawa-Tait on behalf of her whānau, hapū, iwi, whānau whānui and whāngai (Wai 3314)**
And in the Matter	**of a claim by Nicola Dally Paki on behalf of her whānau, hapū, iwi, whānau whānui and whāngai (Wai 3319)**
And in the Matter	**of a claim by Memory Hineari Rore Te Whaiti on behalf of her whānau, hapū, iwi, whānau whānui and whāngai (Wai 3256)**
And in the Matter	**of a claim by Denise Messiter on behalf of her whānau, hapū, iwi, whānau whānui and whāngai (Wai 3331)**

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And in the Matter	**of a claim by Teina Boasa-Dean on behalf of her whānau, hapū, iwi, whānau whānui and whāngai (Wai 3341)**
And in the Matter	**a claim by Cherie Kurarangi on behalf of Wāhine Māori and their Tamariki, mokopuna affiliated with Gangs in Aotearoa NZ (Wai 3378)**
And in the Matter	**a claim by Te Ahuriri on behalf of her whānau, hapū, iwi, whānau whānui and whāngai (Wai 3377)**

MEMORANDUM OF COUNSEL CONFIRMING PARTICIPATION IN THE IDENTITY AND CULTURE KAUPAPA INQUIRY (WAI 3500)

DATED AT TOKOROA THIS 13 DAY OF DECEMBER 2024

NL LAWYERS
BARRISTERS & SOLICITORS

Counsel Acting: Ārama Ngāpō / Te Karu o Whakatihi Brown / Nakita Wiperi / 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

MEMORANDUM OF COUNSEL CONFIRMING PARTICIPATION IN THE IDENTITY AND CULTURE KAUPAPA INQUIRY (WAI 3500)

May It Please the Tribunal

1. In Memorandum-Directions dated 11 October 2024,[1] Her Honour Judge Thomas directed parties wishing to participate in the Identity and Culture Kaupapa Inquiry to file a memorandum confirming their intention to do so.

2. We act for:

   a) Ms Merepeka Raukawa-Tait (Wai 3314)
   b) Ms Nicola Dally-Paki (Wai 3319);
   c) Ms Memory Hineari Rore Te Whaiti (Wai 3299);
   d) Ms Denise Messiter (Wai 3331);
   e) Ms Teina Boasa-Dean (Wai 3341);
   f) Ms Cherie Kurarangi (Wai 3378); and
   g) Ms Te Ahuriri (Wai 3377) together known as ("the Claimants").

3. Although not listed on Preliminary list of claims relevant to the Identity and Culture Kaupapa Inquiry,[2] the Claimants have instructed us to participate in the Identity and Culture Inquiry. Counsel is currently drafting the Claimants amended Statements of Claims which raises issues that fall within the scope of this inquiry.

Dated at Tokoroa this 13 day of December 2024

Ārama Ngāpō
Counsel for Claimant

Te Karu o Whakatihi Brown

Nakita Wiperi

Hussain Sabori

[1] Wai 3500, #2.5.2 Memorandum Direction of Judge Thomas dated 11 October 2024 at [6]
[2] Wai 3500, #2.5.2(a) Preliminary list of claims relevant to the Identity and Culture Kaupapa Inquiry