IN THE WAITANGI TRIBUNAL	**WAI 3500** **WAI TBC**
IN THE MATTER OF	the Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	the Identity and Culture Kaupapa Inquiry
AND	
IN THE MATTER OF	a Claim by Ipu Tito-Absolum on behalf of herself, her whanau and hapu of Te Mahurehure, Te Rauwawe, and Ngati Pakau

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MANATU RŌIA

I tēnei rā, i te rā 11 o Hakihea 2024

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Waitangi Tribunal
16 Dec 24
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel is filed on behalf of the claimant Ipu Tito-Absolum ("Tito-Absolum") on behalf of herself, her whanau and hapu of Te Mahurehure, Te Rauwawe, and Ngati Pakau (Wai TBC).

2. On 11 October 2024, Her Honour Judge Thomas issued a Memorandum-Directions and at [6] invited claimants to confirm their intention to participate in the Identity and Culture Kaupapa Inquiry by 13 December 2024[1].

3. The claimant, Tito-Absolum, confirms her wish to participate in the Inquiry.

4. The Tito-Absolum claim referred to above will be a new claim and as such, is not included in the preliminary list of claims [2].

5. A Statement of Claim has not yet been filed for the claimant. However, counsel advises that a new Statement of Claim will be filed early in the new year of 2025, and at that time, counsel will ask the Tribunal to issue a new Wai number for the claim.

6. Counsel advises the claim will raise issues which fall within the scope of this inquiry, in particular relating to the following areas:

    a. material culture;
    b. heritage;
    c. archives; and

[1] Wai 3500, #2.5.2 at [6].
[2] Wai 3500, #2.5.2(a).

d. films/audiovisual.

7. Accordingly, the claimants of the Tito-Absolum claim, respectfully seek inclusion in the Inquiry.

Daniel Watkins

Claimant Counsel