IN THE WAITANGI TRIBUNAL **Wai 3500**
I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI **Wai 58**

In the Matter	of the Treaty of Waitangi Act 1975
And	
In the Matter	of the Identity and Culture Kaupapa Inquiry (3500)
And	
In the Matter	of a claim by Patricia Tauroa and Robyn Tauroa on behalf of ngā hapū o Whangaroa (Wai 58)

Memorandum of Counsel Regarding Inquiry Participation

Dated 16 December 2024

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16 Dec 24
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WELLINGTON

TAU002/2 - 1363186

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of **Wai 58,** a claim by Patricia Tauroa and Robyn Tauroa on behalf of ngā hapū o Whangaroa **(Claimants)**.

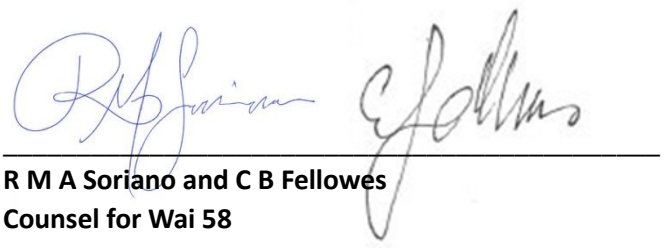
2. In Memorandum-Directions dated 11 October 2024, the Presiding Officer of the Inquiry, Her Honour Judge Thomas, directed Counsel to provide indications of which claimants wish to participate in this Inquiry by 5pm, 13 December 2024.[1]

3. While the Claimants are not included in the preliminary list of claims relevant to the Wai 3500 Inquiry, Counsel indicate that the Claimants wish to participate in this Inquiry.[2]

4. To assist the Tribunal, at this stage, Counsel indicate that grievances the Claimants wish to raise before this Tribunal include, but are not limited to, taonga, material culture, artefacts, and archival processes and procedures. Counsel therefore respectfully request to be involved in any planning matters to take place for this inquiry.

5. Counsel apologises for the delay in filing, only having received instructions this morning. We therefore respectfully seek leave to file the memorandum out of time, and for the document to be placed on the record of inquiry.

Dated at Wellington this 16th day of December 2024



R M A Soriano and C B Fellowes
Counsel for Wai 58

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