

IN THE WAITANGI TRIBUNAL  
KEI MUA I TE TARAIPUNARA

WAI 3500

WAI 1092

WAI 1787

WAI 3272

UNDER

The Treaty of Waitangi Act  
1975

CONCERNING

The Identity and Culture  
kaupapa inquiry

AND

Wai 1092

AND

Wai 1787

AND

Wai 3272

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**MEMORANDUM OF COUNSEL**

Dated: 16 December 2024

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**RECEIVED**

Waitangi Tribunal

**16 Dec 24**

Ministry of Justice  
WELLINGTON

**MAY IT PLEASE THE TRIBUNAL**

**KIA WHAKAAE MAI TE TARAIPUNARA**

1. This Memorandum of Counsel is filed on behalf of:
  - a. the Upokorehe claim, brought by Sandra Aramoana, Wayne Aramoana, Wallace Aramoana, Lance Reha, Gaylene Kohunui and Kahukore Baker (Wai 1092)
  - b. the Rongopopoia Hapū Claim, brought by Hinehou Leef (deceased), Richard Wikotu (Deceased), Aroha Wikotu, Rocky Ihe (deceased), and Kahukore Baker (Wai 1787)
  - c. Te Upokorehe Settlement Claim brought by Wayne Aramoana, Maude Edwards, Kahukore Baker, Jimi Hills, Trevor Ransfield, Wallace Aramoana, Ngaire Ngamoki, Aroha Wikotu, Christine Martin (Wai 3272)

(“**claimants**”)

2. In memorandum-directions dated 11 October 2024, her Honour Judge Thomas directed parties to provide indications of which claimants wished to participate in this inquiry and who their spokesperson and/or legal counsel are.<sup>1</sup>
3. The claimants wish to participate in the Identity and Culture Kaupapa Inquiry. Separate amended statements of claim will be filed shortly on behalf of each of the above claimants including submissions with respect to eligibility of their claim to participate in this inquiry.

Dated: 16 December 2024



Bryce Lyall  
Counsel for the Claimants



Maithili Sreen



Hannah Swedlund

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<sup>1</sup> Wai 3500 #2.5.2, at [5].