

**IN THE WAITANGI TRIBUNAL**

**WAI 3500**

**IN THE MATTER**

of the Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER**

of the Identity and Culture Kaupapa  
Inquiry

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**MEMORANDUM OF COUNSEL REGARDING PARTICIPATION**

**Dated 17 December 2024**

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<b>RECEIVED</b> Waitangi Tribunal
<b>17 Dec 24</b>
Ministry of Justice WELLINGTON

**TamakiLegal**  
Barristers & Solicitors

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**Counsel Acting: Darrell Naden**

**MAY IT PLEASE THE TRIBUNAL**

1. The Memorandum of Counsel is filed on behalf of:
  - a. **Wai 762**, a claim by Te Urunga Evelyn Aroha Kereopa on behalf of the Kereopa whānau and members of Te Ihingārangi, hapū of Ngāti Maniapoto;
  - b. **Wai 1531**, a claim by Te Enga Harris and Lee Harris on behalf of the uri of Hemi Harris and Meri Otene;

**(“the Claimants”)**

2. In Memorandum-Directions dated 11 Oketopa 2024, the presiding officer directed parties to provide instructions of which claimants wish to participate in this inquiry by **5pm, 13 December 2024**.<sup>1</sup>
3. The Claimants are not included in the preliminary list of claims relevant to the Wai 3500 Inquiry, however they have instructed us to confirm their intention to participate.
4. We respectfully seek leave to file out of time due to competing demands on counsel and the claimants time particularly nearing the festive season. Many of our clients have been unavailable. We therefore anticipate that further claimants’ may wish to seek leave to participate in the new year.

**DATED at TĀMAKI MAKĀURAU this 17th day of December 2024**



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Darrell Naden  
**Counsel Acting**

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<sup>1</sup> Waitangi Tribunal, *He pānui whakahaere a te Mana Whakahaere*, 11 Oketopa 2024, Wai 3500, #2.5.002 at 6.