

**I TE RŌPU WHAKAMANA
I TE TIRITI O WAITANGI**

**Wai 3310 Wai 3011
Wai 3083 Wai 3087
Wai 3094 Wai 3095
Wai 3109 Wai 3122
Wai 3170 Wai 3217
Wai 3233 Wai 3235
Wai 3247 Wai 3420
Wai 3420 Wai 3341
Wai 3378**

KEI RARO I TE MANA

o te ture o te Tiriti o Waitangi 1975

I TE TAKE O

**the Education Services and
Outcomes Inquiry (Wai 3310)**

I TE TAKE O

**he kereme nā Paula Ormsby mo te
Wāhine Toa Chapter of the Mongrel
Mob Kingdom and Priority Whānau
including Māori women and their
children associated with other gangs
(Wai 3319)**

I TE TAKE O

**he kereme nā Cherie Kurarangi mo te
Wāhine Toa Chapter of the Mongrel
Mob Kingdom and Priority Whānau
including Māori women and their
children associated with other gangs
(Wai 3378)**

I TE TAKE O

**he kereme nā Denise Messiter mo
tana whānau, hapū, iwi, whānau
whānui me whāngai (Wai 3083)**

I TE TAKE O

**he kereme nā Nicola Dally-Paki mo
tana whānau, hapū, iwi, whānau
whānui me whāngai (Wai 3087)**

RECEIVED Waitangi Tribunal
19 Nov 24
Ministry of Justice WELLINGTON

I TE TAKE O

he kereme nā Merepeka Raukawa-Tait mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3094)

I TE TAKE O

he kereme nā Tipene Halford mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3095)

I TE TAKE O

he kereme nā Genevieve Simpson mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3122)

I TE TAKE O

he kereme nā Peter Maskell mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3170)

I TE TAKE O

he kereme nā Navarre Ratahi a claim by the late Thomas Wakainga Ratahi being represented by Navarre Ratahi on behalf of his whanau, hapuu, iwi, whaanau whaanui and whaangai (Wai 3217)

I TE TAKE O

he kereme nā Gabrielle Wilson mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3233)

I TE TAKE O

he kereme nā Georgia Grant-Mackie mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3235)

I TE TAKE O

he kereme nā Mike Tana mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3328)

I TE TAKE O

he kereme nā Rāpata Wiri mo tana whānau, hapū, iwi, whānau whānui me whāngai (Wai 3420)

I TE TAKE O

**he kereme nā Teina Boasa-Dean mo
tana whānau, hapū, iwi, whānau
whānui me whāngai (Wai 3341)**

I TE TAKE O

**he kereme nā Hakopa Ngapo mo ngā
Uri a Maata Ngāpo Chariatable
Trust (Wai TBC)**

HE MANATU RŌIA MO TE PAKIRĒHUA WAI 3310

I tēnei rā, i te 19 o Noema 2024



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

HE MANATU RŌIA MO TE PAKIRĒHUA WAI 3310

Tēnā e te Taraipiunara:

1. In Memorandum-Directions dated 5 November 2024,¹ Her Honour Judge Mullins directed parties seeking to participate in the Education Services and Outcomes Inquiry to file a memorandum confirming their intention to do so.
2. We note the Education Services and Outcomes Inquiry will conduct this inquiry using the following broad contemporary themes.²
 - a. Mātauranga Māori;
 - b. Primary and secondary schools;
 - c. Tertiary education;
 - d. Curricula;
 - e. Education finance; and
 - f. Te Reo Māori in the education system.
3. This memorandum of Counsel addresses the following points:
 - a. The remaining issues to be heard and determined in this inquiry;
 - b. Any priority matters demanding early attention; and
 - c. The readiness of the claimants and Crown to proceed.
4. We act for:
 - a. Paula Ormsby (Wai 3011);
 - b. Cherie Kururangi (Wai 3378);
 - c. Denise Messiter (Wai 3083);
 - d. Nicola Dally-Paki (Wai 3087);
 - e. Merepeka Raukawa-Tait (Wai 3094);
 - f. Tipene Halford (Wai 3095);
 - g. Genevieve Simpson (Wai 3122);
 - h. Peter Maskell (Wai 3170);
 - i. Thomas Ratahi (Wai 3217);
 - j. Gabrielle Wilson (Wai 3233);
 - k. Georgia Grant-Mackie (Wai 3235);
 - l. Mike Tana (Wai 3247);
 - m. Rāpata Wiri (Wai 3420);
 - n. Teina Boasa-Dean (Wai 3314);
 - o. Hakopa Ngapo on behalf of Ngā Uri a Maata Ngāpo Chariatable Trust; and
 - p. Corina Tairua (Wai TBC)(together known as “the Claimants”)

¹ Wai 3310, #2.5.5 Memorandum Direction of Judge Mullins dated 5 October 2024 at [29]

² Wai 3310, #2.5.5 Memorandum Direction of Judge Mullins dated 5 October 2024 at [15]

5. The Claimants listed at paragraph (4) (a – m) are listed in the preliminary list of claims relevant to the Education Services and Outcomes Inquiry (Wai 3310) Inquiry,³ and seek to participate in this inquiry.
6. Ms Teina Boasa-Dean (Wai 3314) is not listed on the preliminary list of claims, however Ms Boasa-Dean has a registered claim in the Constitutional Kaupapa Inquiry (Wai 3300) and respectfully seeks leave to participate in the Education Services and Outcomes Inquiry.
7. Mr Hakopa Ngāpō and Ms Corina Tairua respectfully seek leave to participate in the Education Services and Outcomes Inquiry. Counsel is drafting these Statements of Claims and raises issues that fall within the scope of this inquiry.

Our Submissions In respect of paragraph 27,⁴

“The remaining issues to be heard and determined in this inquiry”;

8. In the first instance, we need to file Amended Statements of Claim for our Claimants. The Amended Statements of Claims will raise targeted issues that fall within the scope of this inquiry.

“Any priority matters demanding early attention”; and

9. Counsel submits that until we have drafted Amended Statements of Claim, we are not in a position to comment on this issue.

“The readiness of the claimants and Crown to proceed”.

10. Counsel is seeking timetabling directions for Statements of Claims and Amended Statements of Claim to be filled.
11. To conclude, we confirm attendance for the judicial conference on 22 November 2024 at 9:30 am. This has also been confirmed via e-mail to the registrar.

I tēnei rā, i te 19 o Noema 2024



Ārama Ngāpō
Counsel for the Claimants



Te Karu o Whakatihi Brown



Hussain Sabori

³ Wai 3310, #2.5.5 (a)

⁴ Wai 3310, #2.5.5 Memorandum Direction of Judge Mullins dated 5 October 2024 at [27]