

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 3400
WAI 1341
WAI 2691
WAI 2707

I RARO I TE MANA O

te ture o te Tiriti o Waitangi 1975

I TE TAKE O

te ruku tātari ohotata mō te ture mō te
Takutai Moana (Wai 3400)

Ā

I TE TAKE O

tētahi kerēme nā Nora Rameka mā Te
Rūnanga o Ngāti Rēhia mō te hapū o Ngāti
Rēhia (Wai 1341)

Ā

I TE TAKE O

tētahi kerēme nā Edward Wilson mā te
hapū o Ngāti Tamainupō (Wai 2691)

Ā

I TE TAKE O

tētahi kerēme nā Ngāi Te Hapū me
Kataraina Keepa, Umuhuri Matehaere,
Graham Hoete rātou ko Nepia Ranapia mā
Ngā Hapū o Te Moutere o Motiti (Wai
2707)

He Manatu Rōia Tukutahi

I tēnei rā, i te 13 o Māehe 2025

P O Box 133102
Auckland 1146
(09) 9484774
kauparelaw.co.nzlhipera.peters@kaupare.co.nz
aroha.herewini@kaupare.co.nz
amber.evans@kaupare.co.nz

Counsel Acting:

Ihipera Peters / Aroha Herewini / Amber Evans

RECEIVED

Waitangi Tribunal

13 Mar 2025

Ministry of Justice
WELLINGTON

TĒNĀ E TE RŌPŪ WHAKAMAN I TE TIRITI O WAITANGI

1. This Joint Memorandum of Counsel is filed on behalf of the following claims:
 - (a) Wai 1341, a claim by Nora Rameka on behalf of Te Rūnanga o Ngāti Rēhia for and on behalf of Ngāti Rēhia hapū;
 - (b) Wai 2691, a claim by Edward Parahi Wilson for and on behalf of Ngāti Tamainupō hapū; and
 - (c) Wai 2707, a claim ngā karanga hapū o Ngāi Te Hapū and by Kataraina Keepa, Umuhuri Matehaere, Graham Hoete and Nepia Ranapia in their capacity as kuia and kaumātua of Motiti Island.

 (“the Claimants”)
2. By way of Memorandum-Directions dated 18 December 2024, Kaiwhakawā Armstrong directed parties to file cross-examination indications for the upcoming hearing by **5pm, Wednesday 12 March 2025**.¹
3. Counsel respectfully seek leave to question both Crown witnesses, Ms Frances Dagg and Mr Harry Kent Tui Marsh, at the upcoming hearing if required.
4. Counsel will co-ordinate with other claimant and interested party counsel to ensure efficiency and avoid duplication.
5. Counsel apologise for the delay in filing this Memorandum and respectfully seek leave to file out of time and have this document added to the record of inquiry. Counsel submit that no prejudice will result from the delay in filing.

¹ Wai 3400, #2.6.3(a) *Appendix A: Inquiry timetable for stage two of the Marine and Coastal Area (Takutai Moana) Act Coalition Changes Urgent Inquiry* (18 December 2024).

I TĒNEI RĀ, i Ōpōtiki, i te rā 13 o Māehe 2025



Ihipera Peters / Aroha Herewini / Amber Evans
Rōia mō Ngā Kaikerēme