

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
BEFORE THE WAITANGI TRIBUNAL

WAI 3470
WAI 3440

I TE TAKE O
IN THE MATTER OF

the Treaty of Waitangi Act 1975

Ā
AND

I TE TAKE O
IN THE MATTER OF

te Regulatory Standards Bill Urgent Inquiry
(Wai 3470)

E PĀ ANA KI
CONCERNING

Tetahi tono nō Eru Kapa-Kingi, Te Rawhitiroa
Bosch, Anahera Mana-Tupara, Nyze Manuel,
Kiri Tamihere-Waititi me Hohepa Thompson
mō ngā tangata Māori i raro i te tāwharau o
“Toitū Te Tiriti”

MEMORANDUM OF COUNSEL FILING OF FURTHER EVIDENCE
Dated 13 Haratua 2025

RECEIVED Waitangi Tribunal
13 May 25
Ministry of Justice WELLINGTON

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TĒNA, E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

1. This memorandum of counsel is filed on behalf Eru Kapa-Kingi, Te Rawhitiroa Bosch, Anahera Mana-Tupara, Nyze Manuel, Kiri Tamihere-Waititi and Hohepa Thompson on behalf of Māori persons throughout Aotearoa and abroad who are represented by the “Toitū Te Tiriti” movement (the “**Wai 3440 Claimants**”).
2. By way of memorandum-directions dated 9 Haratau 2025, his Honour Judge Milner directed the claimants and interested parties to file any reply evidence by **5 pm, Wednesday 13 May 2025**.¹ Accordingly, please find **attached** for filing and by way of service, the following evidence:
 - a. Signed reply brief of evidence of Professor Andrew Geddis dated 13 Haratau 2025.
 - b. Signed joint reply brief of evidence of Professor Jonathan Boston and Dr Carwyn Jones dated 13 Haratau 2025; and
 - c. Signed reply brief of evidence of Eru Kapa-Kingi dated 13 Haratau 2025.
3. An updated indexed document bank that contains all of the referenced appendices to these briefs of evidence is available at this link:
https://tamakilegal.sharepoint.com/:f/g/EiwiaDZOoIFuHm9vuk_RIYB59IXV3g5g-AyFKAB-uGPbg

DATED this 13th day of Haratua 2025



T Waikato / D Naden / A Johns / L Redward / S Grimberg

Counsel for the Claimants

¹ Waitangi Tribunal, *Appendix C: Updated inquiry timetable for the Regulatory Standards Bill (Wai 3470 Urgent Inquiry)* dated 9 May 2025, Wai 3470, #2.5.5(c).