

**I TE ROOPUU WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL**

WAI 2575

**KEI RARO I TE MANA O
IN THE MATTER OF**

te ture o te Tiriti o Waitangi 1975
the Treaty of Waitangi Act 1975

**ME
AND**

I TE TAKE O

te pakirehua Wai 2575 moo ngaa
kereeme e paa ana ki te Health
Services me Outcomes

IN THE MATTER OF

the Health Services and Outcomes
Kaupapa Inquiry (Wai 2575)

**ME
AND**

I TE TAKE O

te whakaarotau whakahaerenga moo
ngaa kereeme e paa ana ki te Te Aka
Whai Ora disestablishment

IN THE MATTER OF

the Priority Hearing into the claims
relating to Te Aka Whai Ora
disestablishment

**MEMORANDUM OF COUNSEL FILING JOINT CLOSING SUBMISSIONS FOR
THE STAGE 2 PRIORITY INQUIRY INTO THE DISESTABLISHMENT OF TE AKA
WHAI ORA**

Dated: 3 Hune 2025

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Waitangi Tribunal

3 Jun 25

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

Introduction

1. This memorandum of counsel is filed on behalf of the following Claimants:
 - a. Evelyn Kereopa, on behalf of herself, the Kereopa whaanau and members of Te Ihingarangi, Wai 762.
 - b. Richard John Nathan on behalf of the Mangakaahia Hapuu claims collective, Wai 861.
 - c. Esme Warati Sherwin, on behalf of herself, the late Emma Gibbs-Smith, and her whaanau as members of Nga Whaanau o Waitangi Horotutu me Taputaputa o Pahi, Ngaati Kawa, Ngaati Raahiri, and Ngare Raumati, Wai 1477.
 - d. Te Enga Harris and Lee Harris, on behalf of themselves, and the Harris whaanau, Wai 1531.
 - e. April Grace on behalf of herself, the late Charlene Walker-Grace, her whaanau, Ngaa Wahapuu o Te Rarawa o Kohai Settlement, and Te Hokingamai e te iwi o Ngaati Whaatua Ngaapuhi nui tonu and members of Otangarei Marae, Wai 2206.
 - f. Violet Nathan and Maringi Te Aroha Kalva Emily Pia Broughton on behalf of themselves and their whaanau, Wai 2217.
 - g. Bryce Aldridge, Mark Renata Smith and Russell Owen-Smith on behalf of Ngaati Pakahi, Wai 2377.
 - h. Jane Stevens on behalf of the late Nicholas Taiaroa Macpherson Stevens, her whaanau, Ngai Tahu and all Maaori suffering from mental illness, Wai 2671.
 - i. Susan Taylor on behalf of the late Georgia-May Morgan MacBeath, her whaanau and all Maaori suffering from mental illness, Wai 2729.
 - j. John Kearns and Maeva Kearns, on behalf of the Kearns whaanau, Wai 2747.

- k. Michael John Williams and Jessica Williams, on behalf of themselves, their whaanau and members of Ngaituupango, Wai 2776.
- l. Kahura Watene, on behalf of himself and the Watene whaanau, Wai 2778.
- m. Tasilofa Huirama on behalf of the late Ziporah Grace Huirama, her whaanau, as members of Ngaati Ueoneone and Ngaati Tautahi of Ngapuhi, Wai 2890.
- n. Malcolm Kingi, on behalf of himself and Ngaai Tahu oo Moohaka Waikare, Wai 2894; and
- o. Stephanie August on behalf of the late Robert Charles William James Farrar, and her whaanau, and all Maaori rangatahi suffering from mental illness, Wai 3096.

(“Claimants”)

- 2. This memorandum is also filed on behalf of the following Interested Parties:
 - a. Robert Gabel, on behalf of Ngaati Tara, Wai 1886.
 - b. Jasmine Cotter-Williams, on behalf of herself and her whaanau, Wai 2063; and
 - c. Violet Walker on behalf of herself, the late Nuki Aldridge, her whaanau and members of Ngaati Uru and Te Tahawai hapuu, Wai 2382.

(“Interested Parties”)

- 3. By way of memorandum-directions dated 8 Aaperira, His Honour Judge Stone directed that closing submissions for stage two of the Te Aka Whai Ora priority inquiry are to be filed by **5pm, Monday 3 Hune 2025**.¹

¹ Waitangi Tribunal, *Memorandum-Directions of Judge D Stone Appendix A: confirmed inquiry timetable for stage two of the Te Aka Whai Ora (Maaori Health Authority) priority inquiry* dated 8 Aaperira 2025, Wai 2575, #2.6.202(a).

4. Accordingly, on behalf of the Claimants and Interested Parties, we **attach** for filing, and by way of service:
- a. Joint Closing Submissions dated 3 Hune 2025; and
 - b. Appendix A: Bundle of Authorities to Taamaki Legal Joint Closing Submissions.

DATED this 3rd day of **Hune 2025**



Stephanie Roughton / Cheri-Rose Smith
Counsel Acting