BEFORE THE WAITANGI TRIBUNAL

WAI 2200
WAI 113A
WAI 113K
WAI 1623
WAI 1660
WAI 1461

IN THE MATTER OF	The Treaty of Waitangi Act 1975
AND IN THE MATTER OF	claims concerning the Porirua ki Manawatū Inquiry
AND IN THE MATTER OF	a claim by Sir Edward Taihākurei Durie on behalf of Ngāti Tahuriwakanui (Wai 113A)
AND IN THE MATTER OF	a claim by Dennis Emery on behalf of Ngāti Hinepare (Wai 113A)
AND IN THE MATTER OF	a claim by Rachael Selby on behalf of Ngāti Pareraukawa (Wai 113A)

MEMORANDUM OF COUNSEL REGARDING POST-HEARING 3 FILING REQUESTS

29 August 2025

WOODWARD LAW OFFICE

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Waitangi Tribunal
29 Aug 2025
Ministry of Justice
WELLINGTON

AND **IN THE MATTER OF**	claim by Brian Emery on behalf of Ngāti Matakore (Wai 113A)
AND **IN THE MATTER OF**	a claim by Tony Manning on behalf of the Ōtaki Māori Committee on the Ōtaki River (Wai 113A)
AND **IN THE MATTER OF**	a claim by John Cribb on behalf of Ngāti Turoa (Wai 113A)
AND **IN THE MATTER OF**	a claim by Pita Savage and Robbie Richardson on behalf of Ngāti Parewahawaha (Wai 113 A)
AND **IN THE MATTER OF**	a claim by Danny Karatea Goddard, Sue Tumanako Herangi, Rawiri Meihana Durie, Mereti Taipana, Natasha Ropate, and Eljon Fitzgerald on behalf of Ngāti Rangatahi (Wai 1623)
AND **IN THE MATTER OF**	a claim by Jerald Twomey on behalf of Ngati Manomano (Wai 113K)
AND **IN THE MATTER OF**	Queenie Rikihana and Gabrielle Rikihana on behalf of Ngāti Koroki (Wai 113A)
AND **IN THE MATTER OF**	a claim by Dee Winterburn for herself and owners of Māori land blocks Topaatekaahu 7, Topaatekaahu 2 and Pukehou 4C4C1 (Wai 113A)
AND **IN THE MATTER OF**	a claim by Dennis Emery on behalf of Ngā Kaitiaki o Ngāti Kauwhata (Wai 1461)
AND **IN THE MATTER OF**	a claim by Mereti Taipana on behalf of Ngāti Kauwhata (Wai 1660)
AND **IN THE MATTER OF**	a claim by Ani Mikaere, supported by Professor Winiata, on Rangatiratanga (Wai 113A)

E TE KAIWHAKAWĀ, TĒNĀ KOE

1. This memorandum of counsel is made on behalf of the claimants named on the cover sheet.

2. In memorandum-directions dated 30 July 2025 (Wai 2200, #2.6.302), the Presiding Officer requested additional evidential information made at the hearing three, and that Counsel concerned should file the requested information by 5pm, Thursday 21 August 2025 (at [2]-[3]).

3. On 21 August 2025, counsel filed a memorandum of counsel requesting (at [5]) an extension until 29 August 2025 to either:

    3.1. file the requested submission; or

    3.2. provide an update as to when the information will likely be retrieved.

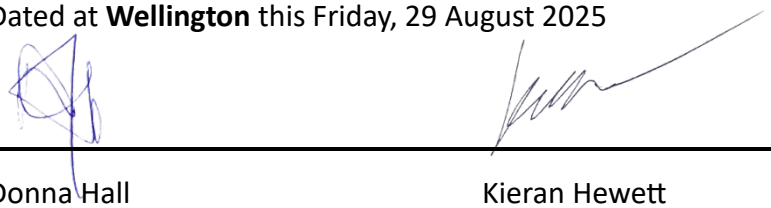
4. Unfortunately, Te Rūnanga o Raukawa has since updated counsel that they are unable to locate the requested information.

5. Given that the requested information is a submission to a Crown ministry, counsel is currently seeking the Crown's assistance in retrieving this information.

6. As such, counsel respectfully requests an extension until 26 September 2025 (reflecting the 20 working days it takes for an Official

Information Act to decide whether to supply any requested information) to file this submission.

Dated at **Wellington** this Friday, 29 August 2025



Donna Hall Kieran Hewett

Woodward Law

On behalf of its claimants.