

I TE RŌPŪ WHAKAMANA I TE TIRITI

WAI 3513
WAI 682

KEI RARO I TE MANA o te ture o te Tiriti o Waitangi 1975

I TE TAKE O te ruku tātari ohotata, the Citizen (Ruddock)
Urgent Claim (Wai 3513)

Ā

I TE TAKE O he kerēme nā Rewiti Paraone rātou ko Erima
Henare, ko Pita Tipene ko Waihoroi Shortland
mō Te Rūnanga o Ngāti Hine mō ngā uri o
Torongare and Hauhaua (Wai 682)

HE MANATŪ RŌIA

I tēnei rā, i te 17 o Mahuru 2025



p 09 404 0953
a 91 Hupara Road, RD2 Kaikohe, Northland 0472
e admin@tukaulaw.co.nz
w www.tukaulaw.co.nz

Ngā rōia

Dr Season-Mary Downs
Chelsea Terei-Tipene
Tatijana-Simon Larsen

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Waitangi Tribunal

17 Sep 25

Ministry of Justice
WELLINGTON

KIA WHAKAAE MAI TE RŌPŪ WHAKAMANA I TE TIRITI:

INTRODUCTION

1. This Memorandum of Counsel is filed on behalf of Te Rūnanga o Ngāti Hine (Wai 682) (“the claimants”). The claimants were granted interested party status in the urgent proceeding.
2. During oral opening submissions and the presentation of evidence by Mrs Keisha Castle-Hughes on the first day of hearing, Tuesday 16 September 2025, a number of additional documents to support Mrs Castle-Hughes’ evidence were raised that had not yet been filed with the Tribunal.
3. Counsel note that confidential copies of these documents were provided to the Tribunal and Crown counsel during the course of the hearing.
4. The confidential nature of these documents pertained to the personal identifying information contained within the documents. This information has now been removed to protect the privacy of those involved.
5. Counsel therefore attach the following redacted copies of the documents as appendices to the brief of evidence of Mrs Castle-Hughes:¹
 - (a) Appendix C - Letter of Passport Denial - September 2021;
 - (b) Appendix D - New Zealand Citizenship Application - July 2023;

¹ Wai 3513, #A5, *Brief of Evidence of Keisha Castle-Hughes* (4 September 2025).

- (c) Appendix E - First Application & Submission, and Appendices - 6 December 2023; and
- (d) Further Application & Submission - 16 January 2025.

I TĒNEI RĀ, te rā 17 o Mahuru 2025



Dr Season-Mary Downs/Chelsea Terei-Tipene/Tatijana Simon-Larsen
Ngā rōia mō ngā kaikerēme