BEFORE THE WAITANGI TRIBUNAL **WAI 3287**
I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI **WAI 3325**

IN THE MATTER of the Treaty of Waitangi Act 1975

AND

IN THE MATTER of a claim by **Chris Insley** on behalf of Te Taumata and Māori generally

---

MEMORANDUM OF COUNSEL UPDATING TRIBUNAL AS TO THE STATUS OF DR RICHARD MEADE EXPERT EVIDENCE FUNDING

3 September 2025

KĀHUI LEGAL

Solicitor: T N Hauraki / T L Thoms
PO Box 1654
WELLINGTON
Telephone: 04 495 9999
Email: tara@kahuilegal.co.nz / tamahou@kahuilegal.co.nz

Counsel Acting: M K Mahuika
PO Box 3087
GISBORNE
Telephone: 021 406 525
Email: matanuku@mahuikalaw.nz

JEJ-104977-2-32-V2

RECEIVED
Waitangi Tribunal
3 Sep 25
Ministry of Justice
WELLINGTON

TĒNĀ, E TE TARAIPIUNARA:

1. This memorandum of counsel is filed on behalf of WAI 3287, a claim by Chris Insley on behalf of Te Taumata and Māori generally.

2. As directed by the Presiding Officer on 18 August 2025, the purpose of this memorandum is to provide an update on the progress of the application to the Legal Aid section of the Ministry of Justice (**Legal Aid**) to fund expert economic evidence from Dr Richard Meade on behalf of WAI 3287.

3. Since making the application to Legal Aid there have been requests for further information, which have been answered. On 29 August 2025 counsel received another letter request for further information from Legal Aid. This included a request for confirmation as to whether other claimants, or the Tribunal, had requested the commissioning of similar economic expert evidence.

4. We expect to provide the further information either today or tomorrow. However, it means that we will again be waiting to hear from Legal Aid on the outcome of the funding application.

DATED at Wellington this 3rd day of September 2025

M K Mahuika / T N Hauraki / T L Thoms
Counsel for Wai 3287