

**IN THE WAITANGI TRIBUNAL  
KEI MUA I TE TARAIPUUNARA**

**WAI 3555  
WAI 499**

**UNDER**

**The Treaty of Waitangi Act  
1975**

**CONCERNING**

**The Waipāoa Remedies  
Inquiry**

**AND**

**A claim by Tanya Parearau  
Brown (deceased) on  
behalf of Ngariki  
Kaiputahi (Wai 499)**

---

**MEMORANDUM OF COUNSEL**

Dated: 8 August 2025

---



---

**Counsel:**  
Bryce Lyall  
Kōkiri Chambers  
PO Box 60649  
Titirangi  
Auckland 0642  
022 658 1895  
Bryce@kokirichambers.nz



**KIA WHAKAAE MAI TE TARAIPUNARA**

**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum is filed on behalf of Wai 499, a claim filed by Tanya Brown on behalf of Ngariki Kaiputahi.
2. In April 2025 Ms Brown passed away, and counsel informed the Tribunal that the whānau were taking time to grieve and to consider how best to carry the claim forward in a way that honours her legacy.
3. In directions dated 24 July 2025, counsel were directed to provide an update by 7 August.<sup>1</sup> We apologise for the delay and respectfully seek a one-day extension.
4. Counsel are pleased to confirm that two whānau members have now been chosen to apply to be added as named claimants. We are currently assisting the whānau with the necessary administrative steps to progress this. Leave is respectfully sought for a further extension to allow for this to occur, with an updating memorandum to be filed by 22 August 2025.

Dated: 8 August 2025



Bryce Lyall  
Counsel for Wai 499



Maithili Sreen



Hannah Swedlund

---

<sup>1</sup> Wai 3555 #2.5.5 at [16].