

BEFORE THE WAITANGI TRIBUNAL

WAI 3555

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the Waipāoa Remedies Inquiry (**WAI 3555**)

**JOINT MEMORANDUM OF COUNSEL FOR THE CLAIMANTS SEEKING
EXTENSION**

Dated on this 12th day of December 2025



**ANNETTE
SYKES & Co.**
barristers & solicitors

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Waitangi Tribunal

12 Dec 2025

Ministry of Justice
WELLINGTON

TĒNĀ E TE TARAIPUNARA:

Introduction

1. This Joint Memorandum of Counsel is filed for and on behalf of the following claimant groups:
 - 1.1 Ngāti Ira o Waioweka (**Wai 558**);
 - 1.2 The owners of Whakapaupakihi No.2 block (**Wai 864**)
 - 1.3 Te Aitanga a Māhaki (**Wai 274/283**);
 - 1.4 Ngā Uri o Tamanui (**Wai 499/507/874**);
 - 1.5 Te Whakatōhea iwi (**Wai 87**);
 - 1.6 Ngati Muriwai hapū (**Wai 2160**);
 - 1.7 Turangapikitoi hapū (**Wai 1794**); and
 - 1.8 Te Whānau A Kai (**Wai 892**).(Collectively, “**the Claimants**”)
2. It is filed in response to Memorandum-Directions dated 20 November 2025,¹ which directed counsel for parties who wish to file submissions on the inclusion of Mangataikapua and any other blocks in this inquiry by 5pm, Friday 12 December 2025.²
3. Counsel for the Claimants and the Crown have met to discuss this matter but require further time to confirm a position and instructions from clients.
4. Therefore, counsel seek an extension to file any submissions by **5pm, Friday 19 December 2025**.



Annette Sykes

Kalei Delamere-

Maia Te Hira

Ririnui

On behalf of Counsel for the Claimants

¹ Wai 3555, #2.5.15 *Memorandum-Directions of Judge Milroy concerning the Waipāoa Remedies Inquiry* dated 20 November 2025.

² At [67].