

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL

Wai 58
Wai 605
Wai 972
Wai 1662
Wai 1843
Wai 2916
Wai 3147
Wai 3149
Wai 3430
Wai 3532

In the Matter of the Treaty of Waitangi Act 1975

And

In the Matter of the Te Rau o te Tika: the Justice System
Inquiry (Wai 3060)

And

In the Matter of a claim by Patricia Jane Tauroa and
Robyn Elizabeth Moana Tauroa, on behalf
of Ngā Hapū o Whangaroa (Wai 58)

And

In the Matter of a claim by Dr Terence Lomax and Te
Rangimarie James Speight relating to the
Waimimiti Block (Wai 605)

(Continued overleaf...)

MEMORANDUM OF COUNSEL SEEKING EXTENSION

Dated 8 October 2025

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RECEIVED

Waitangi Tribunal

8 Oct 25

Ministry of Justice
WELLINGTON

And

In the Matter

of a claim by Donald Tait, Edward Penetito and others on behalf of themselves, the Kauwhata Treaty Claims Kōmiti Te Marae Kōmiti o Kauwhata Trust and Ngā Uri o Ngāti Kauwhata ki te Tonga (Wai 972)

And

In the Matter

of a claim by Leah Marie Wright for herself, and on behalf of the Muriwhenua Hapū Collective (Wai 1662)

And

In the Matter

of a claim by Terence Tauroa on behalf of Te Aeto Hapū, as descendants of Te Puta and Taramainuku (Wai 1843)

And

In the Matter

of a claim by Piripi Gray for the children of Ngāti Toa, Ngāti Raukawa, and Ngāti Kauwhata, who have been placed in state and/or faith-based care (Wai 2916)

And

In the Matter

of a claim by Rawiri Wereta, on behalf of himself, his whānau, and his hapū (Wai 3147)

And

In the Matter

of a claim by Damian Wereta, on behalf of himself, his whānau and his hapū (Wai 3149)

And

In the Matter

of a claim by Toni Lee Jarvis, on behalf of himself, his whānau, and tamariki Māori displaced by the adoption, state care, and justice systems and their whānau (Wai 3430)

And

In the Matter

of a claim by Taniela Waitokia, on behalf of himself, his whānau, and his hapū (Wai 3532)

TĒNĀ E TE TARAIPUUNARA
MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of:
 - a. Wai 58, a claim by Patricia Jane Tauroa and Robyn Elizabeth Moana Tauroa, on behalf of Ngā Hapū o Whangaroa;
 - b. Wai 605, a claim by Dr Terence Lomax and Te Rangimarie James Speight relating to the Waimimiti Block;
 - c. Wai 972, a claim by Donald Tait, Edward Penetito and others on behalf of themselves, the Kauwhata Treaty Claims Kōmiti Te Marae Kōmiti o Kauwhata Trust and Ngā Uri o Ngāti Kauwhata ki te Tonga;
 - d. Wai 1662, a claim by Leah Marie Wright for herself, and on behalf of the Muriwhenua Hapū Collective;
 - e. Wai 1843, a claim by Terence Tauroa on behalf of Te Aeto Hapū, as descendants of Te Puta and Taramainuku;
 - f. Wai 2916, a claim by Piripi Gray for the children of Ngāti Toa, Ngāti Raukawa, and Ngāti Kauwhata, who have been placed in state and/or faith-based care;
 - g. Wai 3147, a claim by Rawiri Wereta, on behalf of himself, his whānau, and his hapū;
 - h. Wai 3149, a claim by Damian Wereta, on behalf of himself, his whānau, and his hapū;
 - i. Wai 3430, a claim by Toni Lee Jarvis, on behalf of himself, his whānau, and tamariki Māori displaced by the adoption, state care, and justice systems and their whānau; and
 - j. Wai 3532, a claim by Taniela Waitokia, on behalf of himself, his whānau, and his hapū.

(Claimants)

2. In Memorandum-Directions dated 25 September 2025,¹Kaiwhakawā Judge Wainwright directed parties to file memoranda by no later than 8 October 2025 5 pm, relating to the following topics:
 - a. Kaikōrero yet to be heard in He Rau Kōrero ā-Tara Whare with accompanying detail;
 - b. Kaikōrero in custody with accompanying detail;
 - c. Any Crown plans to include site visits in its evidence for Te Aronui o Te Tāhū, with information about what and where;
 - d. Which sites, programmes, processes and courts should be prioritised for panel visits; and
 - e. Crown feedback on any difficulties that might arise concerning potential visits listed in Appendix B.²
3. Unfortunately, and regrettably, Counsel are heavily involved with matters relating to the upcoming hearing week for the Wai 1750: North-Eastern Bay of Plenty District Inquiry, and in the preparation of Generic Closing Submissions for the Wai 2200: Porirua ki Manawatū District Inquiry. As a result, and due to time constraints, Counsel have not been able to ascertain instructions from all the Claimants to the detailed level sought by her Honour, particularly for those Claimants who are currently incarcerated.
4. Counsel, therefore, respectfully seek an extension to obtain instructions from the Claimants until Thursday, 16 October 2025, and submit that little, if any, prejudice will accrue as a result of the extension sought.

Dated at Te-Whanganui-a-Tara this 8th day of October 2025



R M A Soriano, S E U Toleafoa, C B Fellowes and R K Gayfer
Counsel for the Claimants

¹ Wai 3060, #2.6.048 at [19].

² Wai 3060, #2.6.048 at [20(a)-(e)].