

**IN THE WAITANGI TRIBUNAL
KEI MUA I TE ROOPU WHAKAMANA I TE
TIRITI O WAITANGI**

**WAI 3060
WAI 745
WAI 3168
WAI 2959**

IN THE MATTER OF the Treaty of Waitangi Act 1975
AND
IN THE MATTER OF the Justice Systems Kaupapa Inquiry (**Wai 3060**)
AND
IN THE MATTER OF a claim by Luana Pirihi and the late Paki Pirihi on
AND behalf of the hapu of Patuharakeke (**Wai 745**)
IN THE MATTER OF a claim by Gilbert Paki on behalf of himself and
AND other Kaiwhakarato Māori working in Prisons,
mauhere Māori and their whanau (**Wai 3168**)
IN THE MATTER OF a claim by Hope Tupara on behalf of te Ropu
Wahine Maori Toko I te Ora / the Maori Women's
Welfare League Inc, its members, and all wāhine
Maori of Aotearoa (**Wai 2959**)

JOINT MEMORANDUM OF COUNSEL

Dated this 8th day of October 2025

This document is filed by:-



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Waitangi Tribunal

8 Oct 25

Ministry of Justice
WELLINGTON

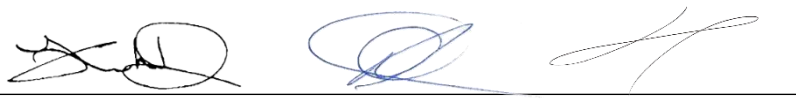
MAY IT PLEASE THE TRIBUNAL

1. This Joint Memorandum of Counsel is filed for Te Rau o te Tika: the Justice System Inquiry (Wai 3060), on behalf of the following:
 - a. Wai 745, a claim by Luana Pirihi and the late Paki Pirihi on behalf of the hapū of Patuharakeke;
 - b. Wai 3168, a claim by Gilbert Paki on behalf of Kaiwhakarato Māori working in prisons, mauhere Māori and their whānau; and
 - c. Wai 2959, a claim by Hope Tupara on behalf of Te Ropu Wahine Maori Toko I te Ora / The Maori Women’s Welfare League Inc, its members, and all wāhine Maori of Aotearoa

(together referred to as “**the Claimants**”).
2. In Memorandum-Directions dated 28 September 2025, parties were directed to file memoranda regarding the following:¹
 - a. Kaikōrero yet to be heard in He Rau Kōrero ā-Tara Whare with accompanying detail;
 - b. Kaikōrero in custody with accompanying detail; and
 - c. Which sites, programmes, processes and courts should be prioritised for panel visits.
3. Her Honour Judge Wainwright directed parties to file memoranda on the above listed issues by **5pm, 8 October 2025**.
4. Counsel have regretfully been unable to finalise instructions from the Claimants in time for filing today and respectfully seek an extension to file memoranda until 5pm, Wednesday 15 October 2025.
5. Counsel apologises for this delay and notes no prejudice will accrue should the extension sought be granted.

¹ Wai 3060, #2.6.048 at [19]-[20].

DATED at Auckland this 8th day of October 2025

Signature: 

Kelly Dixon / Amy Chesnutt / Lucy Tohill

Counsel for the Claimants