

IN THE WAITANGI TRIBUNAL

**WAI 3060
WAI 2906
WAI 3130
WAI 3128**

IN THE MATTER OF

the Treaty of Waitangi Act
1975

AND

IN THE MATTER OF

te Rau o te Tika – the Justice
System Kaupapa Inquiry

AND

IN THE MATTER OF

a claim by Edwin Tuterangi
Whiu, on behalf of himself
and other prisoners from
Northland

a claim by Patrick Halliday on
behalf of himself and other
Māori

a claim by Akuhata Pereene
Hita on behalf of himself and
other Māori from Northland

HE MANATU RŌIA

I tēnei rā, i te rā 08 Whiringa-a-nuku 2025



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RECEIVED Waitangi Tribunal
9 Oct 25
Ministry of Justice WELLINGTON

Claimant Counsel:
Daniel Watkins & Manawa Johnson

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel is filed on behalf of Edwin Tuterangi Whiu, for himself and on behalf of his whanau, hapu and community and all Māori prisoners from Te Tai Tokerau/Northland, Akuhata Pereene Hita on behalf of himself and other Māori from Northland and Patrick Halliday on behalf of himself and other Māori (“together the Claimants”).

Procedural history

2. In Memorandum-Directions (“the Directions”), Her Honour Judge Carrie Wainwright asked Counsel to outline for kaikorero not in custody and kai korero in custody, whether a release date should impact on the planning and presentation of evidence, the name of each kaikorero, what they will speak about and for how long, potential site visit locations and hearings in prison by 8 October 2025.¹
3. Due to competing priorities, Counsel respectfully seeks an extension to 16 October to respond to the Directions and provide the information as requested. Counsel apologises for any inconvenience caused to the parties should the extension request be granted.

DATED at Kaikohe this 8th Day of October 2025



Daniel Watkins

Claimant Counsel

Manawa Johnson

Claimant Counsel

¹ *Waitangi Tribunal*, Memorandum-Directions of the Presiding Officer concerning inquiry planning and fixtures for the 2025/2026 financial year (Wai 3060, 2.6.48)