

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

WAI 3060  
WAI 914  
WAI 2655  
WAI 1092  
WAI 1758  
WAI 1787  
WAI 421  
WAI 593  
WAI 869  
WAI 1247  
WAI 1383  
WAI 1890

**UNDER**

**The Treaty of Waitangi  
Act 1975**

**CONCERNING**

**The Marine and Coastal  
Area (Takutai Moana) Act  
Coalition Changes Urgent  
Inquiry**

**(continued overleaf)**

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**JOINT MEMORANDUM OF COUNSEL FOR JUDICIAL  
CONFERENCE**

Dated: 11 February 2025

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**Counsel:**

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**RECEIVED**

Waitangi Tribunal

**9 Oct 25**

Ministry of Justice  
WELLINGTON

- AND A claim by Gilbert Kiharoa Parker (deceased), Marianne Huhana Renee Parker, Hone Tiatoa and Dion Parker for Waimate Taiamai
- AND Ngā Kairauhii Nannies Against P Claim
- AND The Rongopopoia Hapū Claim, brought by Hinehou Leef (deceased), Richard Wikotu (deceased), Aroha Wikotu, Rocky Ihe (deceased), and Kahukore Baker
- AND The Upokorehe claim brought by Sandra Aramoana, Wayne Aramoana, Wallace Aramoana, Lance Reha, Gaylene Kohunui and Kahukore Baker
- AND The Upokorehe Hapū Ngāti Raumoa Roimata Marae Trust Claim brought by Sandra Aramoana, Wayne Aramoana, Wallace Aramoana, Lance Reha and Gaylene Kohunui
- AND The Combined Claims of Te Waimate Taiamai Claims Alliance

**TĒNĀ, E TE TAIRAIPUNARA,**

1. This joint memorandum of counsel is filed on behalf of:
  - a. Gilbert Kiharoa Parker (deceased), Marianne Huhana Renee Parker, Hone Tiatoa and Dion Parker (Wai 914);
  - b. Ngā Kairauhii Nannies Against P Claim (Wai 2655);
  - c. The combined claims brought by Te Upokorehe (Wai 1092, 1758, 1787); and
  - d. The combined claims of Te Waimate Taiamai ki Kaikohe Alliance (Wai 421, 593, 869, 1383, 1890).

(“**claimants**”)

2. Her Honour Judge Wainwright issued a memorandum-directions on 25 September 2025<sup>1</sup> (the “**memorandum directions**”) inviting parties to file memorandum by 8 October 2025. One of the matters to be addressed was the identification of kaikōrero yet to be heard in *He Rau Kōrero ā-Tara Whare*, with accompanying details.
3. Counsel are still awaiting confirmation of instructions from the claimants on this matter and respectfully seek a short extension until Friday, 10 October 2025, to complete this process.

Dated 8 October 2025



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Bryce Lyall  
Counsel for claimants

Maithili Sreen

Hannah Swedlund

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<sup>1</sup> Wai 3060, #2.6.48.