

**IN THE WAITANGI TRIBUNAL
TE RAU O TE TIKA: THE JUSTICE SYSTEM KAUPAPA INQUIRY**

**WAI 3060
WAI 88 & 89**

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 (WAI 3060)

AND

a claim by the late Te Pehi Parata, Ani Parata, Darrin Parata and Damian Parata for and on behalf of Te Āti Awa Marae Committee, other whānau and hapū of Te Āti Awa/Ngātiawa ki Waikanae, and descendants of Te Kakakura Wi Parata Waipunahau (the Kāpiti Island claim) (WAI 88)

AND

a claim by the late Te Pehi Parata, Ani Parata, Darrin Parata, Karen Parata, Matthew Love-Parata, Ratapu Nelson Solomon, Sandra Louise Marama Edwards, Lois McNaught, Hauangi Kiwha and Doris Lake for and on behalf of Te Āti Awa Marae Committee, other whānau and hapū of Te Āti Awa/Ngātiawa ki Waikanae, and descendants of Te Kakakura Wi Parata Waipunahau (the Whitireia Block claim) (WAI 89)

AND

MEMORANDUM OF COUNSEL REGARDING EXTENSION REQUEST

Dated 9 October 2025

RECEIVED

Waitangi Tribunal

9 Oct 25

Ministry of Justice
WELLINGTON

COUNSEL ACTING

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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the Kapiti Island claim (**Wai 88**); and the Whitireia Block claim (**Wai 89**) (Te Āti Awa/Ngātiawa) ("**the Claimants**").
2. We refer to the Memorandum-Directions dated 25 September 2025 (Wai 3060, #2.6.48), which outlines the requirements for parties to file responses on the following matters to assist with planning the eight days available to this inquiry by **5pm, Wednesday 8 October 2025**,¹ addressing the following matters identified in paragraph [13]:²
 - (a) To advise the Tribunal of any kaikōrero (not in custody) who are yet to be heard in He Rau Kōrero Tara-ā-Whare;
 - (b) To identify any kaikōrero who are in custody; and
 - (c) To indicate whether the parties are keen for the Tribunal to visit any particular facilities, and if so which and why.

EXTENSION REQUEST

3. Counsel confirms that we do not represent any claimants who are in custody. However, we do represent claimants who have yet to be heard in He Rau Kōrero Tara-ā whare. Due to their significant whānau and work commitments; and because they would require extra time and assistance to review the Directions and provide their instructions, counsel respectfully seeks an extension to file responses to the matters outlined above at paragraph [2] by **5pm, Friday 17 October 2025**.
4. In addition, counsel confirms that we have additional claimants who have recently instructed us that they wish to participate in the inquiry under *Te aronui o te tāhū stage*. In light of this, we respectfully seek leave to file amended statements of claims for these claimants, which will include justice-related allegations, and to provide later responses as to whether they wish to present in future He Rau Kōrero Tara ā-Whare.

¹ Wai 3060, #2.6.48 at [19].

² Wai 3060, #2.6.48 at [13].

5. This is significant as some of these claimants are elderly and have allegations arising from other inquiries that have not yet been heard. This will assist the Tribunal in ensuring that all claimants have an opportunity to be heard, noting that He Rau Kōrero Tara-ā Whare is scheduled to be heard from May 2022 – April 2026.³
6. We submit that no prejudice should arise to any party to this proceeding, should the extension request be granted.

DATED this 9th day of October 2025



Chris Beaumont
Counsel for the Claimants



Tekih Veikoso
Counsel for the Claimants

³ Wai 3060, #2.6.48 at [8].