

**IN THE WAITANGI TRIBUNAL**

**WAI 3550  
WAI 3311**

**IN THE MATTER** of The Treaty of Waitangi Act 1975

**AND** of claims in the Economic Development Kaupapa Inquiry (Wai 3550)

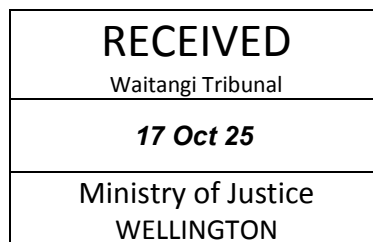
**AND** a claim by Lee Timutimu on behalf of himself and Māori in the Digital Technologies Industry (Wai 3311)

---

**MEMORANDUM OF COUNSEL FILING  
AMENDED STATEMENT OF CLAIM OF WAI 3311**

**Dated 16 October 2025**

---



---

 **WACKROW PANOHO**  
& ASSOCIATES

Level 5, 50 Kitchener Street  
Po Box 461  
AUCKLAND  
Coral Panoho-Navaja / Bobbi Walker  
Ph. (09) 379 5026  
Email: [coral@wpalawyers.co.nz](mailto:coral@wpalawyers.co.nz) / [bobbi@wpalawyers.co.nz](mailto:bobbi@wpalawyers.co.nz)

**MAY IT PLEASE THE TRIBUNAL:**

1. This memorandum is filed for and on behalf of Lee Timutimu and Māori in the Digital Technologies Industry. (the **Claimant**”).
2. On 4 February 2025, counsel filed a memorandum noting the relevance of the Wai 1694 claim to the Economic Development Kaupapa Inquiry and confirming the Claimant’s wish to participate.<sup>1</sup>
3. The Wai 3311 claim has now been amended for aggregation within this Inquiry.
4. An amended statement of claim is **attached** for filing.

Dated at Auckland: 16 October 2025



---

**Coral Panoho-Navaja / Bobbi Walker**  
Counsel for the Claimant

---

<sup>1</sup> Wai 3550, #3.1.10