

**IN THE WAITANGI TRIBUNAL**

**WAI 2500  
WAI 1526**

**IN THE MATTER OF**

the Treaty of Waitangi Act  
1975

**AND**

**IN THE MATTER OF**

the Military Veterans  
Kaupapa Inquiry

**AND**

**IN THE MATTER OF**

a claim by Ipu Tito-Absolum  
on behalf of herself, her  
whanau and hapu

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**HE MANATU RŌIA**

I tēnei rā, i te rā 9 Hakihea 2025

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Claimant Counsel:  
Daniel Watkins & Manawa Johnson

**RECEIVED**

Waitangi Tribunal

**10 Dec 2025**

Ministry of Justice  
WELLINGTON

**MAY IT PLEASE THE TRIBUNAL:**

1. This Memorandum of Counsel is filed on behalf of Ipu Absolum, for herself and on behalf of her whanau and hapu (“the Claimant”).

*Procedural history*

2. In Memorandum-Directions, His Honour Judge Isaac confirmed that the Tribunal will hold a two-day discrete hearing to hear and test the evidence of Phillip Cleaver, Kesaia Walker, Dr Josh King, and accommodate the recall of witnesses Professor Ian Shaw and Courtney Powell.<sup>1</sup>
3. On 5 December 2025 Counsel filed questions in writing for Mr Cleaver and Ms Walker. Counsel has since identified some minor typographical errors.<sup>2</sup> Counsel seeks leave from the Tribunal to update Appendix A. Counsel attaches to this Memorandum at Appendix A questions for Mr Cleaver.

DATED at Kaikohe this 9<sup>th</sup> day of December 2025



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**Daniel Watkins**

Claimant Counsel

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**Manawa Johnson**

Claimant Counsel

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<sup>1</sup> *Waitangi Tribunal* Memorandum-Directions of the Presiding Officer following Hearing Seven of Stage One and other matters (Wai 2500, 2.6.41) at 80.

<sup>2</sup> Appendix A at n., p., s., w., hh.