

BEFORE THE WAITANGI TRIBUNAL

**WAI 3555
WAI 558**

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the Waipāoa Remedies Inquiry (**WAI 3555**)

AND

IN THE MATTER OF

a claim by the late John Kameta, Te Rua Rakuraku, Paeone Goonan and Te Ringahua Hata for and on behalf of Ngāti Ira o Waioweka (**WAI 558**)

MEMORANDUM OF COUNSEL FOR WAI 558

Dated on this 17th day of December 2025



**ANNETTE
SYKES & Co.**
barristers & solicitors

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Waitangi Tribunal

17 Dec 2025

Ministry of Justice
WELLINGTON

TĒNĀ E TE TARAIPUNARA:

Introduction

1. This Memorandum of Counsel is filed for and on behalf of **Wai 558**: a claim by the late Hone Kameta, Te Rua Rakuraku, Paeone Goonan and Te Ringahuia Hata for and on behalf of Ngāti Ira o Waioweka (“**the Claimants**”).
2. It is filed in response to Memorandum-Directions dated 20 November 2025,¹ that directed counsel for parties to:
 - 2.1 file submissions on the inclusion of Mangataikapua and other blocks; and
 - 2.2 update the Tribunal on the progress of commissioning research by 5 pm, Wednesday 17 December 2025.
3. In the Memorandum-Directions it is noted at para [76] that:²

Ms Sykes advised that her clients have secured CFRT funding and identified a researcher to prepare their technical evidence, but the possible researcher concerned would not be able to start work until March 2026 at the earliest. Ms Sykes stated that the claimants wished to commission this specific researcher because of her familiarity with the parties and the rohe. Ms Sykes stated that an additional obstacle to research progress is that Archives New Zealand has been closed and this has required the claimants to make special arrangements to progress some research for the Whakatōhea groups. On that basis, Ms Sykes submitted that her clients were hopeful of completing their research by May 2026.

Commissioning research

4. Despite best efforts, the Claimants have yet to secure a researcher. Counsel have had advanced discussions with two potential researchers who are currently working on other commissions that are expected to be completed next year.
5. If either researcher is confirmed, the first researcher is unavailable to start any work on a research project for the Claimants until January 2026 and the second researcher is unavailable to start any potential work until May 2026.
6. Counsel are confident that one of the two will be confirmed by February 2026, and seek leave to file an update by 16 February 2026, prior to the commencement of the site visit to the Waipāoa blocks if confirmed.

¹ Wai 3555, #2.5.15 *Memorandum-Directions of Judge Milroy concerning the Waipāoa Remedies Inquiry* dated 20 November 2025.

² At [76].

Proposed site visit

7. In relation to a proposed site visit, counsel see limited utility in visiting sites this early in the inquiry. The idea of using a drone to capture video footage to aid in providing visuals of the land blocks was raised at a hui with other claimant counsel on Friday 12 December, and garnered some support.

Including Mangataikapua and other blocks

8. Our position on the inclusion of the Mangaoronogo block and the Mangataikapua block is neutral, and we will abide the decision of the Tribunal in this respect. We note that both blocks border the Waipāoa area of interest under consideration but neither have Crown Forest Licensed Lands located on them.

DATED at Rotorua/Wellington this 17th day of December 2025



Annette Sykes

Kalei Delamere-
Ririnui

Maia Te Hira

Counsel for the Claimants