

**IN THE WAITANGI TRIBUNAL
KEI MUA I TE ROOPU WHAKAMANA
I TE TIRITI O WAITANGI**

**WAI 3555
WAI 892**

UNDER The Treaty of Waitangi Act 1975

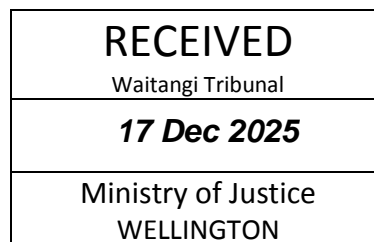
CONCERNING The Crown Forest Assets Act 1989

AND The Waipāoa Remedies Inquiry

AND A claim by David Hawea on behalf
of himself and Te Whānau A Kai
(Wai 892)

MEMORANDUM OF COUNSEL PROVIDING UPDATE ON RESEARCH

Dated this 17th day of December 2025



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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of Mr David Hawea on behalf of himself and Te Whānau a Kai (“**Wai 892**”).
2. In Memorandum-Directions dated 20 November 2025, her honour Judge Milroy directed claimants to update the Tribunal on the status of research by 17 December 2025.¹

CFRT Research Funding

3. Counsel confirms that CFRT funding has been approved for Wai 892’s participation in the Wai 3555 inquiry. Furthermore, Wai 892 has engaged Tony Walzl to undertake commissioned research.
4. Mr Walzl is working toward having his research completed by the end of the first quarter of 2026.

DATED at Auckland this 17th day of December 2025

Three handwritten signatures in black ink are displayed horizontally. From left to right: 'Christopher Finlayson', 'K Dixon', and 'T Talamaivao'.

Hon C F Finlayson KC / K Dixon / T Talamaivao / H Morrow

Counsel for Te Whānau a Kai

¹ Wai 3555, #2.5.15 at [80].