

**IN THE WAITANGI TRIBUNAL  
KEI MUA I TE TARAIPUNARA**

**WAI 3555  
WAI 499  
WAI 507  
WAI 874**

**UNDER** **The Treaty of Waitangi Act  
1975**

**CONCERNING** **The Waipāoa Remedies  
Inquiry**

**AND** **A claim by Tanya Parearau  
Brown (deceased) on  
behalf of Ngariki  
Kaiputahi (Wai 499)**

**AND** **A claim by Rawiri Brown  
on behalf of Ngariki  
Kaiputahi (Wai 874)**

**AND** **A claim by Owen Lloyd for  
and on behalf of Ngā Ariki  
Kaiputahi (Wai 507)**

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**JOINT MEMORANDUM OF COUNSEL**

Dated: 16 January 2026

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Waitangi Tribunal

**16 Jan 2026**

Ministry of Justice  
WELLINGTON

**KIA WHAKAAE MAI TE TARAIPUNARA**

**MAY IT PLEASE THE TRIBUNAL**

1. This joint memorandum is filed on behalf of Ngā Uri o Tamanui Claimants Wai 499, Wai 874, and Wai 507 (**NUOT**).
2. In directions #2.5.15 parties were invited to submit on a proposed site visit to be held in February 2026.
3. It is respectfully submitted that a site visit is premature. Research reports and mapping have not yet been produced, and the relevant sites have not yet been fully identified.
4. For these reasons, NUOT submits that any site visit would be better scheduled as part of the hearings, or immediately before or after the hearing of the claims.


Dated 16 January 2026



Bryce Lyall  
Counsel for Wai 499 and Wai 874



Hannah Swedlund



Tom Bennion  
Counsel for Wai 507



Emma Whiley