

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

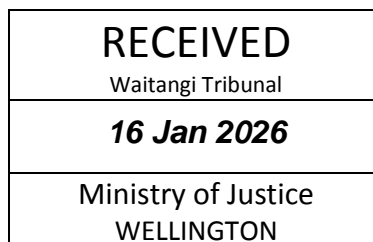
CONCERNING The Crown Forest Assets Act 1989

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 SEEKING EXTENSION

Dated this 16th day of January 2026



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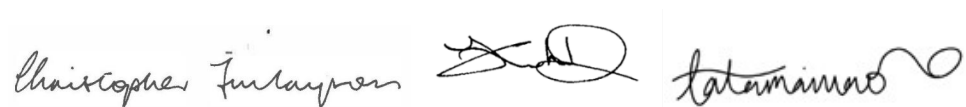
MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of Mr David Hawea on behalf of himself and Te Whānau a Kai (Wai 892) (“**the Claimants**”).
2. In Memorandum-Directions dated 20 November 2025, her honour Judge Milroy directed claimants to make submissions regarding a proposed site visit by 5pm, Friday 16 January 2026.¹

Site visit

3. Counsel considers that there may be greater utility in deferring any site visit until the Claimants’ evidence is more fully developed. At that stage, the Claimants are likely to have greater clarity on its position about how a site visit should be conducted.
4. Therefore, Counsel respectfully seeks that the proposed site visit be deferred until closer to the filing of evidence.

DATED at Auckland this 16th day of January 2026



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

Counsel for Te Whānau a Kai

¹ Wai 3555, #2.5.15 at [111].