

IN THE WAITANGI TRIBUNAL

**WAI 1700
WAI 1511**

CONCERNING

the Treaty of Waitangi Act
1975

**AND
IN THE MATTER OF**

The North Eastern Bay of
Plenty Inquiry

**AND
IN THE MATTER OF**

Kate Keita Hudson on
behalf of ngā uri o Te Waru
Tamatea and Ngāi
Tamatea ki Waioatahe

**MEMORANDUM OF COUNSEL FILING
TECHNICAL EVIDENCE FOR HEARING EIGHT**

Dated this 2nd day of February 2026

RECEIVED

Waitangi Tribunal

2 Feb 25

Ministry of Justice
WELLINGTON

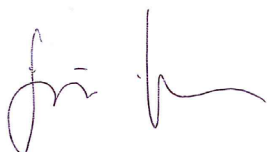


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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Wai 1511 a claim by Kate Keita Hudson on behalf of Ngā Uri o Te Waru Tamatea – Ngai Tamatea ki Waiotahe hapū in accordance with the Memorandum-Directions of his Honour Judge Doogan directing Counsel to file any new technical evidence for hearing eight by 30 January 2026.¹
2. On 28 January, Counsel sought leave to file the technical evidence of Wai 1511 – a report on Ngāi Tamatea hapū by Ms Mary Gillingham on Monday 2 February.
3. Accordingly, this memorandum accompanies for filing the report ‘Mai Wairoa ki Waiotahe – a history of Ngāi Tamatea hapū’ by Mary Gillingham.
4. Despite best efforts, due to capacity reasons the document bank is not available to file at this point. Counsel respectfully seeks further leave to file the document bank by Monday 9 February on the basis that little to no prejudice arises.

DATED this 2nd day of February 2026



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Tania Te Whenua
Claimant Counsel



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Lauren Chand
Claimant Counsel

¹ Wai 1750, #2.6.43(a).