

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

**WAI 2575**

**KEI RARO I TE MANA O**

te ture o te Tiriti o Waitangi 1975

**IN THE MATTER OF**

the Treaty of Waitangi Act 1975

**ME**

**AND**

**I TE TAKE O**

te whakaarotau whakahaerenga moo  
ngaa kereeme e paa ana ki te Te Aka  
Whai Ora disestablishment

**N THE MATTER OF**

the Priority Hearing into the claims  
relating to Te Aka Whai Ora  
disestablishment

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**MEMORANDUM OF COUNSEL FILING SUGGESTED CORRECTIONS TO THE  
DRAFT TRANSCRIPT FOR STAGE TWO OF THE TE AKA WHAI ORA (MAAORI  
HEALTH AUTHORITY) PRIORITY INQUIRY HEARING WEEK ONE**

**Dated 30th September 2025**

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**RECEIVED**

Waitangi Tribunal

**30 Sep 25**

Ministry of Justice  
WELLINGTON

**TamakiLegal**

Barristers & Solicitors

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**Counsel Acting: SJ Roughton / M Rathod**

## **MAY IT PLEASE THE TRIBUNAL**

1. This memorandum of counsel is filed on behalf of the following Claimants:
  - a. Te Urunga Aroha Evelyn Kereopa, on behalf of herself, the Kereopa whaanau and members of Te Ihingarangi, Wai 762.
  - b. Richard John Nathan on behalf of the Mangakaahia Hapuu claims collective, Wai 861.
  - c. Esme Warati Sherwin, on behalf of herself, the late Emma Gibbs-Smith, and her whaanau as members of Nga Whaanau o Waitangi Horotutu me Taputaputa o Pahi, Ngaati Kawa, Ngaati Raahiri, and Ngare Raumati, Wai 1477.
  - d. Te Enga Harris and Lee Harris, on behalf of themselves, and the Harris whaanau, Wai 1531.
  - e. April Grace on behalf of herself, the late Charlene Walker-Grace, her whaanau, Ngaa Wahapuu o Te Rarawa o Kohai Settlement, and Te Hokingamai e te iwi o Ngaati Whaatua Ngaapuhi nui tonu and members of Otangarei Marae, Wai 2206.
  - f. Violet Nathan and Maringi Te Aroha Kalva Emily Pia Broughton on behalf of themselves and their whaanau, Wai 2217.
  - g. Bryce Aldridge, Mark Renata Smith and Russell Owen-Smith on behalf of Ngaati Pakahi, Wai 2377.
  - h. Jane Stevens on behalf of the late Nicholas Taiaroa Macpherson Stevens, her whaanau, Ngai Tahu and all Maaori suffering from mental illness, Wai 2671.
  - i. Susan Taylor on behalf of the late Georgia-May Morgan MacBeath, her whaanau and all Maaori suffering from mental illness, Wai 2729.
  - j. John Kearns and Maeva Kearns, on behalf of the Kearns whaanau, Wai 2747.

- k. Michael John Williams and Jessica Williams, on behalf of themselves, their whaanau and members of Ngaituupango, Wai 2776.
- l. Kahura Watene, on behalf of himself and the Watene whaanau, Wai 2778.
- m. Tasilofa Huirama on behalf of the late Ziporah Grace Huirama, her whaanau, as members of Ngaati Ueoneone and Ngaati Tautahi of Ngapuhi, Wai 2890.
- n. Malcolm Kingi, on behalf of himself and Ngaai Tahu oo Moohaka Waikare, Wai 2894; and
- o. Stephanie August on behalf of the late Robert Charles William James Farrar, and her whaanau, and all Maaori rangatahi suffering from mental illness, Wai 3096.

**(“Claimants”)**

- 2. This memorandum of counsel is also filed on behalf of the following Interested Parties:
  - a. Robert Gabel, on behalf of Ngaati Tara, Wai 1886.
  - b. Jasmine Cotter-Williams, on behalf of herself and her whaanau, Wai 2063; and
  - c. Violet Walker on behalf of herself, the late Nuki Aldridge, her whaanau and members of Ngaati Uru and Te Tahawai hapuu, Wai 2382.
- 3. By way of memorandum-directions dated 16 September 2025, his Honour Judge Stone directed that any suggested corrections to the draft transcript for the Te Aka Whai Ora Priority Inquiry Hearing Week One be filed by **12pm, 30 September 2025**.<sup>1</sup>

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<sup>1</sup> Waitangi Tribunal, *Memorandum-Directions of Judge D Stone Releasing the Transcript for the Te Aka Whai Ora Priority Inquiry Hearing* dated 16 September 2025, Wai 2575, #2.6.208 at [3].

4. Accordingly, we **attach** for filing and by way of service the Claimants' and Interested Parties' suggested corrections to the draft transcript for the Te Aka Whai Ora Priority Inquiry Hearing Week One as **Appendix "A"**.

**DATED** this 30<sup>th</sup> day of **September 2025**

Handwritten signatures of Stephanie Roughton and Mukti Rathod in blue ink.

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**Stephanie Roughton / Mukti Rathod**

Counsel Acting