BEFORE THE WAITANGI TRIBUNAL

WAI 3575
WAI 1212
WAI 1194

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF Te Tinihanga o Ngā Mātāpono o te Tiriti – the Treaty Principles Reform Urgent Inquiry **(WAI 3565)**

AND

IN THE MATTER OF he kerēme nā **Colleen Skerrett-White**, **Timitepo Hohepa** me **Te Ariki Derek Morehu** mō **Ngāti Te Rangiunuora** me **Ngāti Pikiao (WAI 1212** and **WAI 1194)**.

MEMORANDUM OF COUNSEL
I tēnei rā, te 18 o Mei 2026

RECEIVED
Waitangi Tribunal
18 May 26
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed for and on behalf of Colleen Skerrett-White, Timitepo Hohepa me Te Ariki Derek Morehu mō Ngāti Te Rangiunuora me Ngāti Pikiao (WAI 1212 and WAI 1194).

2. On 13 May 2026, the Presiding Officer, Dr C L Fox, by way of email from the Registrar, directed counsel for the claimants and interested parties to file evidence for the claimants and interested parties by 4 pm, Monday 18 May 2026. Accordingly, counsel seek leave to file with this Memorandum of counsel, the following briefs of evidence on behalf of the Wai 1212 and Wai 1194:

   a) The Brief of evidence of Colleen Skerrett-White dated 18 May 2026;

   b) The Brief of evidence of Rangiamohia Dansey-White dated 18 May 2026; and

   c) The index and appendices to the Brief of evidence of Rangiamohia Dansey-White dated 18 May 2026.

DATED at Rotorua this 18th day of May 2026

Annette Sykes	Kalei Delamere-Ririnui	Jack Potaka	Rangipurei Manley

Counsel for the Claimants