**BEFORE THE WAITANGI TRIBUNAL**
**I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI**

**WAI 3565**
**WAI 1508**
**WAI 1757**

**UNDER** the *Treaty of Waitangi Act 1975*

**AND**

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

**FOR** **HERBERT RIHARI** for and of behalf of **NGATI TOREHINA KI MATAKA**
(Wai 1508 and Wai 1757)

*Interested Party*

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**MEMORANDUM OF COUNSEL ON BEHALF OF NGATI TOREHINA KI MATAKA REGARDING CONFLICT OF INTEREST OF APPOINTED PANEL MEMBER**

**DATED 14 MAY 2026**

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RECEIVED
Waitangi Tribunal
***14 May 26***
Ministry of Justice
WELLINGTON

CORBAN REVELL
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***Counsel Acting: John Kahukiwa and Gabriella Brayne***

**MAY IT PLEASE THE TRIBUNAL,**

1. This Memorandum is filed on behalf of Herbert Rihari for and on behalf of Ngāti Torehina ki Matakā (Wai 1508/1757) as an Interested Party in the Treaty Principles Reform Urgent Inquiry (Wai 3565).

2. This memorandum addresses the Memorandum of Directions of Chief Judge Fox regarding a potential conflict of interest of an appointed panel member issued 7 May 2026 (Wai 3565, #2.5.4).

3. At para 4, the Tribunal invited any parties who have any issue with the appointment of Mr Kevin Prime to this inquiry panel to file submissions by 5pm, Thursday 14 May 2026.

4. Counsel for Wai 1508/1757 wish to confirm that there is no issue with Mr Prime's appointment to the Wai 3565 Inquiry Panel and have no further submissions to make on this appointment.

Dated 14 May 2026

John Kahukiwa and Gabriella Brayne
**Counsel for Ngati Torehina Ki Mataka**