I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI **WAI 3565**

KEI RARO I TE MANA	o te ture o te Tiriti o Waitangi 1975
Ā	
I TE TAKE O	Te Tinihanga o Ngā Mātāpono o te Tiriti – the Treaty Principles Reform Urgent Inquiry (Wai 3565)
E PĀ ANA KI	Te pāti e tautoko ana i te kerēme o "Toitū Te Tiriti" (Wai 3440)

MEMORANDUM OF COUNSEL FILING BRIEFS OF EVIDENCE

Date: 19 May 2026

RECEIVED
Waitangi Tribunal
19 May 26
Ministry of Justice
WELLINGTON

TamakiLegal
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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of the "Toitū Te Tiriti" movement (Wai 3440) who were granted interested party status in this inquiry on 1 May 2026.

2. At paragraph [166] of Memorandum-directions dated 6 Haratua 2026[1], her Honour, directed counsel for claimants and interested parties to file evidence by 4pm, Friday 15 May 2026.

3. On 13 May 2026, counsel for the Crown filed a Memorandum of counsel requesting an extension to file unredacted documents to a later date, and therefore to consider adjusting claimant and interested party counsel to have an extension to file evidence to reflect Crown's request[2].

4. By way of email from the Registrar dated 13 May 2026, her Honour provided an extension to claimant and interested party counsel to file evidence by 4pm, Monday 18 May 2026.

5. On 28 May 2026, counsel filed a memorandum of counsel on behalf of Toitū Te Tiriti seeking a short extension to file evidence by 12pm, Tuesday 19 2026.

6. By way of email from the Registrar dated 18 May 2026, her Honour granted counsel the short extension to file evidence.

7. Accordingly, please find **attached** the following Briefs of evidence:

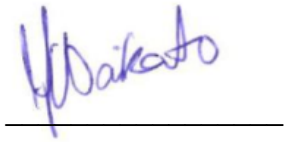
    a. Brief of Evidence of Eru Ruanui Tia Kapa-Kingi;

    b. Brief of Evidence of Dr Carwyn Jones; and

    c. Document Bundle for the Brief of Evidence of Dr Carwyn Jones.

[1] Waitangi Tribunal*, Decision on application for urgent inquiry* Dated 6 Haratua 2026, Wai 3565, #2.5.1, at {166}.
[2] D Hunt, G Allan, *Memorandum of Counsel for the Crown* dated 13 May 2026, Wai 3565, #3.1.31, at [5].

DATED at **Tamaki Makaurau** this **19th** day of **May 2026**



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