

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

WAI 3555
WAI 995

UNDER *The Treaty of Waitangi Act 1975*

AND

IN THE MATTER OF the Waipaoa Remedies Inquiry

AND

IN THE MATTER OF of claims therein by **ANTHONY TONY TAPP and by HOKIMATEMAI KAHUKIWA** for and on behalf of Te Rangiwhakataetaea, Wi Haronga, and Ngati Matepu of which they are descendent members

the Wai 995 Claimants

MEMORANDUM OF COUNSEL FOR THE WAI 995 CLAIMANTS ON RESEARCH
PROGRESS

DATED 7 MAY 2026



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RECEIVED

Waitangi Tribunal

7 May 2026

Ministry of Justice
WELLINGTON

May it please the Tribunal,

1. This memorandum of counsel for Te Rangiwhakataetaea, Wi Haronga, and Ngati Matepu (**Wai 995**) provides an update to the Tribunal on research progress for Wai 995, as per the Presiding Officer's memorandum-directions on 9 April 2026.¹
2. Since June 2025, when the Waipaoa Remedies (**Wai 3555**) Urgent Inquiry was confirmed by Her Honour, counsel has undertaken research for Wai 995, building from the whakapapa evidence and korero brought in the Mangatu Remedies Inquiry, and further Māori Land Court archival records specific to Waipaoa. This research led to counsel undertaking further research in the adjoined Mangataikapua land block, as relevant to the history of land alienation across the connecting whenua.
3. Wai 995 does not intend to contract an independent researcher or historian, to present further technical evidence in Wai 3555, as the research process undertaken and planned (based on studies of Māori Land Court records, and korero held by the claimants) will be sufficient to inform Wai 995's claim. Further evidence will likely be provided by way of the claimant's briefs and korero before the Tribunal.
4. It is understood that the Court of Appeal's decision on the Mangatu Remedies Inquiry, and further leave sought for an appeal, has created some uncertainty for decisions concerning Wai 3555. However, counsel notes that clarification of the boundaries for Wai 3555 and a decision on counsel's proposal for Mangataikapua to be included within this, is necessary for progressing Wai 995's research

¹ Wai 3555, #2.5.16

(concerning the related history of Waipaoa and Mangataikapua) and updating the Tribunal accordingly.²

Dated 7 May 2026

Handwritten signatures of J P Kahukiwa and G Brayne in black ink.

J P Kahukiwa/G Brayne counsel for the Wai 995 Claimants

² Wai 3555, #3.1.39