

IN THE WAITANGI TRIBUNAL
KEI MUA I TE RŌPU WHAKAMANA I TE TIRITI O WAITANGI

WAI 3555
WAI 1781

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Crown Forest Assets Act 1989

AND

IN THE MATTER OF claims to the Waipaoa Blocks (part of
the Mangatū State Forest) (Wai 3555)

AND

IN THE MATTER OF a claim by Tracy Hillier and the late Rita
Rangitaia Wordsworth for an on behalf
of themselves and the hapū of Ngai
Tamahaua (Wai 1781)

MEMORANDUM OF COUNSEL PROVIDING UPDATE ON RESEARCH

Dated 8 MAY 2026



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RECEIVED

Waitangi Tribunal

8 May 2026

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed on behalf of Tracy Hillier and the late Rita Rangitaia Wordsworth for an on behalf of themselves and the hapū of Ngai Tamahaua (“the **claimants**”).
2. In Memorandum-Directions dated 9 April 2026, her honour Judge Milroy directed claimants to update the Tribunal on the status of research by 7 May 2026.¹

CFRT Research Funding

3. Despite continued efforts the claimants have not yet been able to secure CFRT funding to undertake research to support their claims in this inquiry.
4. Efforts are continuing and a further update will be provided to the Tribunal as soon as possible.

Leave for late filing

5. Counsel apologise for the late filing of this memorandum and respectfully seek the Tribunal’s leave for the same.

DATED at Tāmaki Makaurau 8 May 2026:



Raewyn Clark / Alice Madsen

Claimant Counsel

¹ Wai 3555, #2.5.16.