OFFICIAL

IN THE WAITANGI TRIBUNAL

Wai 3500

Wai 371

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF Cultural Identity Kaupapa Inquiry (Wai 3500)

BY A claim by Henry MatanIdentitygi, Hori Hemara Niha (D), Iris Nihi, Te Aroha Hina Matangi (D), Alwyn Niha, Te Awhi Peter Niha for and on behalf of the descendants of Hori Niha, Niha Hamuera, Hoana Kariki, Eruera Niha, Taitiana Rewi, Hoori Eruera Niha and Materoa Taki Hotorene (D) (Wai 371)

RECEIVED
Waitangi Tribunal
13 Jul 26
Ministry of Justice
WELLINGTON

MEMORANDUM OF COUNSEL

Dated: 13 July 2026

Te Pātaka O Te Mana Tangata Chambers

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MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel ("MoC") is filed on behalf of a claim by Henry Matangi, Hori Hemara Niha (D), Iris Nihi, Te Aroha Hina Matangi (D), Alwyn Niha, Te Awhi Peter Niha, for and on behalf of the descendants of Hori Niha, Niha Hamuera, Hoana Kariki, Eruera Niha, Taitiana Rewi, Hoori Eruera Niha and Materoa Taki Hotorene (D), Wai 371 "the Claimants".

2. Following the Tribunal's direction granting aggregated status,[1] Counsel file the accompanying Amended Statements of Claim for:

- **a.** Constitutional Kaupapa Inquiry (Wai 3300);
- **b.** Education Services and Outcomes Inquiry (Wai 3310);
- **c.** Social Services and Social Development Inquiry (Wai 3460); and
- **d.** Taku Ahurea, Taku Tūākiri: Cultural Identity Kaupapa Inquiry (Wai 3500).

3. The accompanying Amended Statements of Claim particularise the relevant kaupapa issues while relying on the original Statement of Claim,[2] the aggregation memorandum,[3] and the evidence previously filed.

4. Counsel respectfully seek that the accompanying Amended Statements of Claim be received and placed on the record for the relevant kaupapa inquiries.

Dated 13 July 2026

Mireama Houra
Counsel Acting

Monir Hossain
Counsel Assisting

[1] Memorandum-Directions of Deputy Chief Judge C T Coxhead dated 3 June 2026, Wai 1040, #2.7.44.
[2] Wai 1040, #1.1.43.
[3] Wai 1040, #3.4.80.