BEFORE THE WAITANGI TRIBUNAL

WAI 2750
WAI 2813

UNDER — **The Treaty of Waitangi Act 1975**

CONCERNING — **The Housing Policy and Services Kaupapa Inquiry**

AND — **A claim by John Tamihere, and Raymond Hall on behalf of themselves, Te Whānau o Waipareira Trust, and the National Urban Māori Authority**

HE MANATŪ ROIA MŌ WAI 2813

MEMORANDUM OF COUNSEL FOR WAI 2813

Dated: 9 October 2026

Counsel:
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KŌKIRI CHAMBERS

RECEIVED
Waitangi Tribunal
9 Oct 26
Ministry of Justice
WELLINGTON

TĒNĀ, E TE RŌPŪ WHAKAMANA I TE TIRITI:

1. This memorandum of counsel is filed for Wai 2813, a claim by John Tamihere and Raymond Hall on behalf of Te Whānau o Waipareira Trust and the National Urban Māori Authority.

2. The claimants are parties to the joint memorandum of claimant counsel dated 7 October 2026.

3. Ahead of the judicial conference on 13 October 2026, the claimants emphasise two points:

    a) First, the truncated hearing time must not compromise the right to the observance of the principles of natural justice by the Tribunal.[1]

    b) Second, time should be allowed for closing submissions to be presented in person. The issues before the Tribunal are broad, and in-person closings will ensure they are properly addressed.

4. Counsel will attend the judicial conference and can speak to these points, but has a High Court case management conference at 9:00 am that morning and may join a few minutes late if it runs over.

Dated: 9 October 2026

Bryce Lyall
Counsel for Wai 2813 Claimants

Hannah Swedlund

[1] Section 27 New Zealand Bill of Rights Act 1990.