IN THE WAITANGI TRIBUNAL **KEI MUA I TE TARAIPIUNARA**	**WAI 1750** **WAI 1092** **WAI 1787** **WAI 3272** **WAI 1758**
UNDER	**The Treaty of Waitangi Act 1975**
CONCERNING	**The North-Eastern Bay of Plenty District Inquiry**
AND	**The Rongopopoia Hapū Claim, brought by Hinehou Leef (deceased), Richard Wikotu (deceased), Aroha Wikotu, Rocky Ihe (deceased), and Kahukore Baker (Wai 1787)**
AND	**The Upokorehe claim brought by Sandra Aramoana, Wayne Aramoana, Wallace Aramoana, Lance Reha, Gaylene Kohunui and Kahukore Baker (Wai 1092)** **(cont)**

JOINT MEMORANDUM OF COUNSEL

Dated: 30 October 2026

RECEIVED
Waitangi Tribunal
30 Oct 26
Ministry of Justice
WELLINGTON

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KŌKIRI CHAMBERS

AND	**Te Upokorehe Settlement Claim (Wai 3272)**
AND	**The Upokorehe Hapū Ngāti Raumoa Roimata Marae Trust Claim brought by Sandra Aramoana, Wayne Aramoana, Wallace Aramoana, Lance Reha and Gaylene Kohunui (Wai 1758)**

KIA WHAKAAE MAI TE TARAIPIUNARA

1. This joint memorandum of counsel is filed on behalf of the following Te Upokorehe claimants:

    1.1. Wai 1092, the Upokorehe claim, brought by Sandra Aramoana, Wayne Aramoana, Wallace Aramoana, Lance Reha, Gaylene Kohunui and Kahukore Baker (represented by Bryce Lyall).

    1.2. Wai 1787, the Rongopopoia Hapū Claim, brought by Hinehou Leef (deceased), Richard Wikotu (Deceased), Aroha Wikotu, Rocky Ihe (deceased), and Kahukore Baker (represented by Bryce Lyall).

    1.3. Wai 3272, Te Upokorehe Settlement Claim brought by Wayne Aramoana, Maude Edwards, Kahukore Baker, Jimi Hills, Trevor Ransfield, Wallace Aramoana, Ngaire Ngamoki, Aroha Wikotu, Christine Martin (represented by Bryce Lyall).

    1.4. Wai 1758, the Upokorehe Hapū Ngāti Raumoa Roimata Marae Trust Claim brought by Sandra Aramoana, Wayne Aramoana, Wallace Aramoana, Lance Reha and Gaylene Kohunui (represented by Robyn Zwaan of Te Aro Law).

    (**Te Upokorehe**).

2. Te Upokorehe were directed to file tangata whenua evidence for Hearing Week 12 by 27 October 2026.[1] On 23 October 2026 counsel sought an extension to 30 October 2026.

3. This memorandum appends the briefs of evidence of:

[1] Wai 1750, #2.6.76(a).

3.1. Wallace Aramoana;

3.2. Aroha Wikotu;

3.3. Christine Martin;

3.4. Curley Keno;

3.5. Edward Tuari;

3.6. Jimi Hills;

3.7. Kahukore Baker;

3.8. Juanita Aramoana;

3.9. Trevor Ransfield;

3.10. Moana Rarere; and

3.11. Ngaire Ngamoki.

4. Counsel seeks a further extension to file the following further briefs of evidence by 2 November 2026:

4.1. Pomare Edwards;

4.2. Maude Edwards;

4.3. Suzette Klock;

4.4. Gaylene Kohunui;

4.5. Susan Klock;

4.6. Graham Tuari;

4.7. Lance Reha;

4.8. Poppy Tuari;

4.9. Elizabeth Graham;

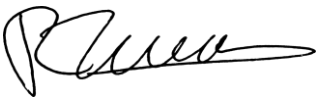
4.10. Stevie Klock; and

4.11. Elizabeth Aramoana.

5. The briefs of evidence have been drafted, and counsel are waiting for final instructions and e-signatures. No prejudice should occur from this extension.

Dated: 30 October 2026

Bryce Lyall Hannah Swedlund
Counsel for Wai 1787, Wai 1092 and Wai 3272



Robyn Zwaan
Counsel for Wai 1758