

IN THE WAITANGI TRIBUNAL

Wai 2700
Wai 2660
Wai 2750
Wai 1040
Wai 1537

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Mana Wāhine Kaupapa
Inquiry

BY a claim by Louisa Te Matekino
Collier, Amiria Waetford and
Hineamaru Akinihi Lyndon, on
behalf of themselves, and the
descendants of Wiremu Pou, and
Georgiana Meens.

**MEMORANDUM OF COUNSEL FILING THIRD
AMENDED STATEMENT OF CLAIM TO INCLUDE
MANA WĀHINE ISSUES**

31 August 2018

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Waitangi Tribunal

3 September 2018

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel (“this MoC”):
 - a. is filed on behalf of the Claimants for Wai 1537, Louisa Te Matekino Collier, Amiria Waetford and Hineamaru Akinihi Lyndon, on behalf of themselves, and the descendants of Wiremu Pou, and Georgiana Meens (“the Claimants”); and
 - b. files the Third Amended Statement of Claim (“SoC”) of the Claimants.

2. In Memorandum-Directions (“MDs”) dated the 9th of July 2018, His Honour directed that the following documents were to be filed by the 31st of August 2018:
 - a. all new and Amended SoCs; and
 - b. submissions addressing the eligibility of the claim/s to participate in this Inquiry.¹

Amended Statement of Claim

3. Accompanying this MoC is the Third Amended SoC for the Wai 1537 Claimants.

4. Counsel advises that the Third Amended SoC is a consolidation of the previous SoCs for Wai 1537, and includes the new Mana Wāhine issues, which are reflected in newly inserted paragraphs 1, 5, 46 – 69, 75, and 76.

Eligibility

¹ *Memorandum-Directions of the Chairperson* (Wai 2700 #2.5.6) at paragraph 6.

5. On the 19th of February 2018, eligibility issues were traversed in an MoC,² responding to His Honour's initial MDs dated the 16th of November 2017.³
6. Counsel respectfully reiterates the submissions made in that MoC, namely, that the Claimants are eligible to participate in this Inquiry, because their Claim:
 - a. comprises issues of national scale and significance;
 - b. does not relate to historical or other grievances which have:
 - i. previously been fully heard and reported on by the Tribunal;
 - ii. formed part of an historical te Tiriti o Waitangi/Treaty of Waitangi settlement with the Crown; or
 - iii. already been fully consolidated by Tribunal direction into district or kaupapa inquiries that are currently underway.

Dated 31 August 2018



Janet Mason
Counsel Acting

Sophia Collinson
Counsel Assisting

² *Memorandum of Counsel* (Wai 2700, #3.1.21).

³ *Memorandum-Directions of the Chairperson* (Wai 2700 #2.5.1).