

OFFICIAL

Wai 120, #2.10
Wai 2700, #3.1.119

IN THE WAITANGI TRIBUNAL
THE MANA WAHINE KAUPAPA INQUIRY

WAI 2700
WAI 1632
WAI 120
WAI 1729
WAI 1837
WAI 1928
WAI 2217
WAI 2257
WAI 2570

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

the Mana Wahine Kaupapa Inquiry

MEMORANDUM OF COUNSEL

Dated 3 September 2018

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| RECEIVED |
| Waitangi Tribunal |
| 3 Sep 2018 |
| Ministry of Justice WELLINGTON |

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Counsel Acting: Moana Sinclair / Chris Beaumont

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following claimants:
 - (a) Te Raumoia Balneavis Kawiti and Rhonda Aorangi Kawiti on behalf of the Kawiti Marae Committee, the Kawiti whanau, and descendants of Ngati Hine, Ngati Manu, Te Kapotai, Ngati Rahiri, Ngati Rangi, Ngaitewake and Nga Puhi **(WAI 120)**;
 - (b) Deidre Nehua for and on behalf of the whanau, hapu and iwi of Te Tai Tokerau **(Wai 1837)**;
 - (c) Maringitearoha Kalva Emily Pia Broughton, and Violet Nathan **(WAI 2217)**;
 - (d) Maruhaeremuri Stirling, Ruiha Edna Stirling, Parehuia Herewini and Haro McIlroy for and on behalf of themselves and the whanau of the hapū Te Whanau a Apanui **(WAI 2257)**;
 - (e) Hari Benevides, Hoani Hipango and the late Wilson Ropoama Smith **(WAI 1632)**;
 - (f) Sara Poananga for and on behalf of the whanau, hapu and iwi of Ngati Kauwhata ki te Tonga **(WAI 1729)**;
 - (g) Gloria Karaitiana on behalf of herself and her whanau **(WAI 1928)**; and
 - (h) Mihingarangi Greenaway on behalf of Ngati Huia ki Katihiku **(WAI 2570)**.

("the Claimants").

2. We refer to our Memorandum filed on Thursday 30 August 2018 at 2:57 pm. In that Memorandum we sought an extension to file the amended statements of claim on behalf of the Claimants.
3. Accordingly, this Memorandum attaches for filing and by way of service the amended statements of claim on behalf of the Claimants. We apologise for the delay in filing and seek leave to file out of time as per the Memorandum referred to at paragraph 2 above.

4. Should leave to file out of time be granted, we submit that no prejudice will arise to any party to this proceeding.

DATED this 3rd day of September 2018



Chris Beaumont
Counsel for the Claimants