

**OFFICIAL**

**Wai 1632, #3.1.1**  
**Wai 2700, #3.1.122**

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**

---

**RECEIVED**

Waitangi Tribunal

**4 Sep 2018**

Ministry of Justice  
WELLINGTON

**Te Haa Legal**

---

PO Box 138, Otaki 5542

Phone: 06 364 5504

Mobile: 027 238 5854 / 021 023 72283

Email: [moana@tehaalegal.co.nz](mailto:moana@tehaalegal.co.nz) / [chris@tehaalegal.co.nz](mailto:chris@tehaalegal.co.nz)

**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 Raumoa 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 3<sup>rd</sup> day of September 2018



**Chris Beaumont**  
Counsel for the Claimants