

**IN THE WAITANGI TRIBUNAL**

**Wai 2700**

**IN THE MATTER OF** the Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF** the Mana Wāhine Kaupapa  
Inquiry

**AND**

**IN THE MATTER OF** Ange Chaney, on behalf of  
herself, and on behalf of Te  
Whare Rokiroki Māori Women's  
Refuge, and Māori women and  
tamariki who experience  
domestic violence.

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**MEMORANDUM OF COUNSEL FILING  
STATEMENT OF CLAIM**

**9 August 2018**

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<b>RECEIVED</b> Waitangi Tribunal
<b>09 Aug 19</b>
Ministry of Justice WELLINGTON

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**Counsel Assisting:** Yvette Rigby

## **MAY IT PLEASE THE TRIBUNAL:**

- 1.** This Memorandum of Counsel (“this MoC”) is filed on behalf of Ange Chaney, on behalf of herself, and on behalf of Te Whare Rokiroki Māori Women’s Refuge, and Māori women and tamariki who experience domestic violence (“the Claimant”).
  
- 2.** In Memorandum-Directions (“MDs”) dated the 9<sup>th</sup> of July 2018, His Honour directed that the following documents were to be filed by the 31<sup>st</sup> of August 2018:
  - a.** all new and Amended SoCs; and
  - b.** submissions addressing the eligibility of the claim/s to participate in this Inquiry.<sup>1</sup>
  
- 2.** On the 19<sup>th</sup> of February 2018, eligibility issues were traversed in an MoC,<sup>2</sup> responding to His Honour’s initial MDs dated the 16<sup>th</sup> of November 2017.<sup>3</sup>
  
- 3.** Counsel respectfully reiterates the submissions made in that MoC, namely, that the Claimant is eligible to participate in this Inquiry, because her 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.

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

<sup>2</sup> *Memorandum of Counsel* (Wai 2700, #3.1.21).

<sup>3</sup> *Memorandum-Directions of the Chairperson* (Wai 2700 #2.5.1).

4. Counsel therefore respectfully requests that:
- a. the Claim be registered as a new claim; and
  - b. the Claim be joined to the Wai 2700: Mana Wāhine Kaupapa Inquiry.

**Dated 9 August 2018**



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**Janet Mason**  
**Counsel Acting**

**Yvette Rigby**  
**Counsel Assisting**