

IN THE WAITANGI TRIBUNAL
MANA WĀHINE KAUPAPA INQUIRY

WAI 2200
WAI 2160

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

the Mana Wāhine Kaupapa Inquiry (WAI 2700)

AND

a claim by Christina Mary Davis, Christina Rolleston, Adriana Sylvia Edwards, Theresa Patricia McMurtrie, John Robert Edwards, Ruth Gage, Glenis Anne Fleet, Georgina Hope Fleet, Alexander Joseph Edwards, Frank Porter, Eva Edwards, Tony Rolleston, Glenis Patricia Reeve, Stephen Paul Fleet, Bronwyn Fleet, Geoffrey T Fleet, Dawn Elsie Tuhakaraina, Margaret Tuhakaraina, the late Paku Gordon Edwards, the late Raymond J Fleet, and the late Adriana Gerrard on behalf of Ngāti Muriwai (Wai 2160)

MEMORANDUM OF COUNSEL

Dated 18 March 2020

RECEIVED

Waitangi Tribunal

18 Mar 2020

Ministry of Justice
WELLINGTON

Te Haa Legal

PO Box 138, Ōtaki 5542

Phone: 027 238 5854 / 021 023 72283

Email: moana@tehaalegal.co.nz / 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 Christina Davis, Christina Rolleston, Adriana Edwards, Patricia McMurtrie and others on behalf of Ngāti Muriwai (“**the Claimants**”).
2. On 18 November 2019, previous counsel for the Claimants, Morrison Kent, filed a Memorandum of Counsel and Amended Statement of Claim for the Claimants in the Wai 2700 Mana Wāhine Kaupapa Inquiry. The Amended Statement of Claim has not yet been registered or added to the Wai 2700 Record of Inquiry. Nor has it been included in the list of claims seeking to participate in the Wai 2700 Inquiry attached to the Memorandum-Directions of Judge Reeves dated 17 February 2020 (Wai 2700, #2.5.13 and #2.5.13(a))¹.
3. We understand that the Tribunal is awaiting confirmation on whose behalf the claim is brought. Counsel confirms that the Amended Statement of Claim is filed on behalf of the original named claimants to the Wai 2160 claim. The Claimants are listed on the intituling page of this Memorandum and ‘as amended’ on the Amended Statement of Claim **attached**, as filed by Morrison Kent on 18 November 2019. Counsel confirms that no amendments have been made to the content of the Amended Statement of Claim except for typographical errors. The filing date shown has been amended to today’s date.
4. As detailed in Morrison Kent’s accompanying Memorandum filed on 18 November 2019, an extension was sought to file the Amended Statement of Claim by 18 November 2019.
5. Counsel are instructed by the Claimants to re-file the Amended Statement of Claim (**attached**) and seek inclusion in the Wai 2700 Mana Wāhine Kaupapa Inquiry.

DATED this 18th day of March 2020



Moana Sinclair
Counsel for the Claimants



Chris Beaumont
Counsel for the Claimants

¹ Wai 2700, #2.5.13 – Memorandum-Directions of Presiding Officer convening Judicial Conference, dated 17 February 2020; and Wai 2700, #2.5.13(a) – Appendix A: List of claims seeking to participate in the Wai 2700 Mana Wāhine Kaupapa Inquiry.