

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

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**MEMORANDUM OF COUNSEL SEEKING FURTHER EXTENSION  
DATED 1<sup>ST</sup> APRIL 2020**

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**RECEIVED**

Waitangi Tribunal

**1 Apr 2020**

Ministry of Justice  
WELLINGTON

**TamakiLegal**  
Barristers & Solicitors

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**Counsel Acting: Darrell Naden / Stephanie Roughton / Siasoi Loa**

## MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following claimants:
  - a. Jasmine Cotter-Williams on behalf of herself and her whānau and members of Ngāti Taimanawaiti (Wai 2063);
  - b. Denise Egen, on behalf of herself, her whānau and members of Te Mahurehure (Wai 2005);
  - c. Robert Gabel on behalf of Ngati Tara (Wai 1886);
  - d. Annette Hale on behalf of herself, the late James Toopi Kokere Wikotu, the Wikotu whanau and Te Ūpokorehe (Wai 2743);
  - e. Te Enga Harris and Lee Harris, on behalf of themselves, and the Harris whanau (Wai 1531);
  - f. Evelyn Kereopa on behalf of herself, the Kereopa Whanau and members of Te Ihingarangi (Wai 762);
  - g. Kathryn Nicol and Sonia Matheson on behalf of themselves, the late Kathleen Ngahuia Mardon, and the late Emma Gibbs-Smith, and their whānau (Wai 1488);
  - h. Merle Mata Ormsby, Daniel Ormsby, Tiaho Mary Pillot and Manu Patena for and on behalf of themselves and members of Ngāti Tamakōpiri, Ngāti Hikairo and Ngāti Hotu. (Wai 1196);
  - i. Bryce Peda-Smith, Steven Mark Renata and Russell Owen-Smith on behalf of Ngati Pakahi (Wai 2377);
  - j. Rueben Taipari Porter on behalf of his whanau, and members and descendants of whanau Pani, Tahawai and Kai tangata whanau (Wai 1968);

- k. William Reihana, on behalf of his whanau and members of Ngati Tautahi ki Irenga (Wai 1957);
- l. Okeroa Rogers, on behalf of herself, and the Rogers whanau and Ngati Koheriki (2869);
- m. William Taueki, on behalf of the Taueki whanau, the late Ron Taueki and Muaūpoko (Wai 237);
- n. Susan Taylor, on behalf of herself, and the Taylor whanau as a member of Te Whakatōhea (Wai 2729);
- o. Mona Vercoe Cliffe, on behalf of herself, her whanau and the wahine of Ngai Maihi hapū (Wai 2863);
- p. Violet Walker, on behalf of Ngati Uru and Te Tahawai (Wai 2382);
- q. Violet Walker, as a member of Ngati Kahu, Ngati Rangi, Ngati Porou and Ngāpuhi (Wai 2818);
- r. Charlene Walker-Grace, on behalf of Te Hokingamai e te iwi o Ngāti Whātua, Ngāpuhi nui tonu (Wai 2206); and
- s. Michael Williams, on behalf of the wahine of Ngaitūpango (Wai 2838).

("the Claimants")

2. By way of memorandum-directions dated 17 February 2020 ("the Directions"), the Tribunal sought submissions on several matters.<sup>1</sup> On Thursday 26 March 2020, the Claimants sought an extension until 4pm, Wednesday 1<sup>st</sup> April 2020 to provide submissions on research, Nga korero tuku iho process, and the overlap with the Wai 2915 Oranga Tamariki Urgent Inquiry (the "extension request"). By memorandum-directions dated 27 March 2020, the requested extension was granted.

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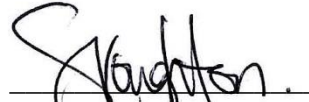
<sup>1</sup> Wai 2700, #2.5.13 at [6].

3. Phoenix Law have yet to file their submissions. Therefore, we seek a further extension until 5pm, three working days after the filing of the Phoenix Law submissions. Given that the Judicial Conference has now been adjourned due to Covid-19, counsel submits that little prejudice will be caused to any other party should the extension sought be granted.

**DATED at Auckland this 1st day of April 2020**



**Darrell Naden  
Counsel Acting**



**Stephanie Roughton  
Counsel Acting**



**Siaso Loa  
Counsel Acting**