

IN THE WAITANGI TRIBUNAL

**WAI 3300
WAI 1823
WAI 2797**

IN THE MATTER OF

The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

Tomokia ngā tatau o Matangireia: the
Constitutional Kaupapa Inquiry (Wai
3300)

AND

IN THE MATTER OF

A claim by Michaela Rangitaawa
Schofield (Wai 1823); and a claim by
Te Rangikaiwhiria Kemara on behalf
of Ngaa Hapuu Maha O Maniapoto
(Wai 2797)

JOINT MEMORANDUM OF COUNCIL

DATED 16 DECEMBER 2024

Te Mata Law Ltd
Barristers and Solicitors
PO Box 44331
Point Chevalier
AUCKLAND 1246

Tel: 0508-TEMATA (0508-836282)

Counsel Acting: David Stone | Charl Hirschfeld | Catherine Leauga | Barney
Tūpara | Matthew Kennelly | Harry Clatworthy | Paige Joy

David@tematalaw.co.nz | Charl@tematalaw.co.nz | Catherine@tematalaw.co.nz |
Barney@tematalaw.co.nz | Matthew@tematalaw.co.nz | Harry@tematalaw.co.nz |
Paige@tematalaw.co.nz



RECEIVED

Waitangi Tribunal

16 Dec 24

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Michaela Rangitaawa-Schofield, the named claimant for Wai 1823 and Te Rangikaiwhiria Kemara, the named claimant for Wai 2797 (“the claimants”).
2. Both of the claimants attended the wānanga held in Ngaruāwahia from 2-3 December 2024 and gave kōrero regarding constitutional perspectives from the uri of Te Rohe Pōtae O Maniapoto.
3. It was noted in the kōrero of the Wai 1823 claimant that she wishes to file a copy of the covenant ‘Ko te Kawenata o Ngāti Maniapoto me ona hapu maha’ (“The covenant”).
4. The covenant was released in 1904 and is a declaration of the political sovereignty of Te Rohe Pōtae O Maniapoto Māori.
5. The covenant emphasizes the tribal unity of Maniapoto based on the preservation of mana, Māoritanga and tino rangatiratanga.
6. The Wai 1823 claimant is a direct descendant of the signatory Haupokia te Pakaru. The Wai 2797 claimant is a direct descendant of the signatory Hari (Maruru) Te Matetoto.
7. Because of their close whānaunga links and desire to whakapakari the kotahitanga of Maniapoto, the claimants have instructed counsel to file the covenant jointly.
8. Accordingly, counsel files the covenant as Appendix A and respectfully seeks leave for it to be placed on the Record of Inquiry for the Wai 3300 Inquiry.

Dated this 16th day of December 2024 at Tāmaki Makaurau

David Stone

Charl Hirschfeld

Harry Clatworthy

Counsel for the claimants

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for Wai 3300 Tomokia ngā tatau o Matangireia: the Constitutional Kaupapa Inquiry.