

IN THE WAITANGI TRIBUNAL

Wai 3400

Wai 120

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF Marine and Coastal Area (Takutai Moana) Act Coalition Changes Urgent Inquiry

BY Te Raumoa Balneavis Kawiti (*dec*), Rhonda Aorangi Kawiti, and Michelle Jessop on behalf of the Kawiti Marae Committee, the Kawiti Whānau, and their descendants of Ngāti Hine, Ngāti Manu, Te Kapotai, Ngāti Rāhiri, Ngāti Rangi, Ngāitewake and Ngāpuhi Iwi

**MEMORANDUM OF COUNSEL FILING BRIEF OF EVIDENCE
OF RHONDA AORANGI KAWITI**

6 March 2025

Phoenix Law Limited

Barristers and Solicitors

200 Willis Street

PO Box 27400

Marion Square

Wellington 6141

Phone: (04) 384 1354

Email: mason@phoenixlaw.expert

and: hossain@phoenixlaw.expert

Counsel Acting: Janet Mason

Counsel Assisting: Monir Hossain

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Waitangi Tribunal

7 Mar 2025

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel (“MoC”):
 - a. is filed on behalf of Te Raumoia Balneavis Kawiti (*dec*), Rhonda Aorangi Kawiti, and Michelle Jessop on behalf of the Kawiti Marae Committee, the Kawiti Whānau, and their descendants of Ngāti Hine, Ngāti Manu, Te Kapotai, Ngāti Rāhiri, Ngāti Rangi, Ngāitewake and Ngāpuhi Iwi (“the Claimants”); and
 - b. files a Brief of Evidence (“BoE”) of Rhonda Aorangi Kawiti, dated 6 March 2025.
2. In Memorandum-Directions dated 18 December 2024, His Honour Judge Armstrong directed parties to file evidence in support of their claim no later than 19 February 2025.¹
3. On 15 January 2025, the Presiding Officer, through email by the Registrar, granted an extension to the Claimants to file their evidence by 26 February 2025.²
4. On 26 February 2025, the Claimants sought a further extension to file their evidence by the end of 14 March 2025.³ On 27 February 2025, the Presiding Officer, through email, granted an extension to file the Claimants’ evidence by 5 March 2025.⁴
5. Counsel seeks leave for the BoE to be filed slightly out of time, and apologises sincerely for any inconvenience caused.

Dated 6 March 2025



Janet Mason
Counsel Acting

¹ See Wai 3400, #2.6.003 at [13].

² See email from the Assistant Registrar dated 15 January 2025.

³ *Memorandum of Counsel Seeking an Extension to File Briefs of Evidence*, dated 26 February 2025.

⁴ Email from the Assistant Registrar dated 27 February 2025.