

IN THE WAITANGI TRIBUNAL

Wai 3400

Wai 2147

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 Moerangi Potiki, on behalf of herself, her whānau, and Te Rūnanga o Ngāti Whakaue Incorporated, for and on behalf of Ngāti Whakaue ki Maketu Hapū

MEMORANDUM OF COUNSEL FILING

BRIEF OF EVIDENCE OF MOERANGI POTIKI

13 March 2025

Phoenix Law Limited

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Counsel Acting: Janet Mason

Counsel Assisting: Luke Evison

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Waitangi Tribunal

14 Mar 2025

Ministry of Justice

WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel (“MoC”):
 - a. is filed on behalf of Moerangi Potiki, on behalf of herself, her whānau, and Te Rūnanga o Ngāti Whakaue Incorporated, for and on behalf of Ngāti Whakaue ki Maketu Hapū (Wai 2147) (“the Claimants”); and
 - b. files a Brief of Evidence (“BoE”) of Moerangi Potiki, dated 13 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 out of time, and apologises sincerely for any inconvenience caused.

Dated 13 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.