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IN THE WAITANGI TRIBUNAL **WAI 2700**
THE MANA WĀHINE KAUPAPA INQUIRY **WAI 113C**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	**the Mana Wāhine Kaupapa Inquiry (Wai 2700)**
AND	**a claim by Stephanie Turner and Heeni Collins as the descendants of the whānau of Te Rauparaha and as descendants of Hapekituarangi (Ngāti Huia, Ngāti Kikopiri, hapū of Ngāti Raukawa) (WAI 113C)**

MEMORANDUM OF COUNSEL

Dated 31 March 2025

RECEIVED
Waitangi Tribunal
31 Mar 25
Ministry of Justice
WELLINGTON

Te Haa Legal

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MAY IT PLEASE THE TRIBUNAL

Introduction

1. This Memorandum of Counsel is filed on behalf of Stephanie Turner and Heeni Collins as the descendants of the whānau of Te Rauparaha and as descendants of Hapekituarangi (Ngāti Huia, Ngāti Kikopiri, hapū of Ngāti Raukawa) **(Wai 113C)** ("the Claimants").

2. The Claimants are currently participating in the Wai 2200 Porirua ki Manawatū Inquiry, in association with the Te Hono ki Raukawa cluster under the claim number "Wai 113C".

3. On 20 May 2019, Ms Turner filed a memorandum for Wai 113C requesting to be added as a named claimant for Wai 113. Hui minutes dated 1 April 2019 had confirmed that while she had a mandate to represent Wai 113 as a named claimant for her whānau, her request to become a named claimant was declined on the basis that "only hapū can be named claimants on the forum".

4. Nonetheless, Her Honour Chief Judge Dr C L Fox directed that Ms Turner be approved to file a statement of claim as part of Wai 113, under the claim number "Wai 113C".[1]

5. The Claimants respectfully seeks leave to aggregate Wai 113C into the Mana Wāhine Kaupapa Inquiry, on the grounds set out in this memorandum.

6. It is important to make clear that the Claimants do not purport to represent the Wai 113 claim or the wider Ngāti Raukawa ki te Tonga claims. The Claim is made for themselves, and their whānau as the descendants of Hape Ki Tuarangi and as the descendants of the whānau of Te Rauparaha.

7. Ms Turner and Ms Collins are co-claimants on the Wai 2419, along with Mr Scott Porter. Ms Turner and Ms Collins filed and presented evidence in support of Wai 2419 during the Tūapapa hearings.[2] With the support of Mr Porter, Ms Turner and Ms Collins have instructed that they wish to continue participation in the Mana Wāhine Inquiry under the Wai 113C claim with the representation of Te Haa Legal.

[1] Wai 2200, #2.6.61 at [11]
[2] Wai 2200, #A108 and #A109.

The Claim

8. Counsel submit that this claim is suitable for aggregation on the grounds that allegations around Crown historical breaches of te Tiriti have been made and heard in the Porirua ki Manawatū Inquiry, but allegations in regard to Mana Wāhine have not been heard in any other inquiry.

9. It is recognised that the claim eligibility phase of this inquiry has passed, and it is now entirely up to the panel to decide whether Wai 113C can participate as a separate claim. Counsel submit that any prejudice arising from this is mitigated in that the named claimants are not making a new claim, but continuing to pursue the issues raised in a previous claim.

10. Should leave to participate in this inquiry be declined, the Claimants seek leave to participate as Interested Parties. Counsel submit that the Claimants meet the criteria in this regard.

11. Accordingly, we attach for filing and by way of service an Amended Statement of Claim for **Wai 113C**, and respectfully seek leave for this to be added to the record of inquiry out of time.

DATED this 31st day of March 2025

Chris Beaumont
Counsel for the Claimants

Tekih Veikoso
Counsel for the Claimants