IN THE WAITANGI TRIBUNAL **WAI 2200**
THE PORIRUA KI MANAWATŪ DISTRICT INQUIRY **WAI 113C**

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	**the Porirua ki Manawatū District Inquiry (WAI 2200)**
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 18 August 2025

RECEIVED
Waitangi Tribunal
18 Aug 25
Ministry of Justice
WELLINGTON

COUNSEL ACTING
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MAY IT PLEASE THE TRIBUNAL

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. On 25 to 26 July 2024, Hearing Week 17 of the Ngāti Raukawa and Affiliated Groups phase ("the Hearing") was held over two days,[1] during which our Claimants presented their evidence, and provided accompanying materials in support of that evidence.[2]

SEEKING LEAVE TO FILE ONLINE ARTICLE

3. Counsel respectfully seeks leave to file an online article reflecting the Claimants oral presentation. Although the contents of this article were addressed during Hearing Week 17, its placement on the Record recognises and preserves the mana of the Claimants, contributing to the historical narrative, that acknowledges the Claimants perspective, and ensures that the matters raised are acknowledged.

4. Accordingly, counsel attaches the Claimants article as **"Appendix A"**, which is also accessible online.[3]

DATED this 18th day of August 2025

Chris Beaumont
Counsel for the Claimants

Tekih Veikoso
Counsel for the Claimants

[1] Wai 2200, #2.6.274(a) and Wai 2200, #3.391.
[2] Wai 2200, #3.2.1609, Wai 2200, #U6, #U6(a), #U6(b), and #U6(c).
[3] Stephanie Turner and Heeni Collins "Claimants lament loss of Rangiuru Pā" (9 August 2024) Ōtaki Today <https://otakitoday.com/claimants%20lament%20loss%20of%20rangiuru%20p%C4%81>.