

BEFORE THE WAITANGI TRIBUNAL

**WAI 2700
WAI 2872**

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the Mana Wāhine Kaupapa Inquiry (WAI 2700)

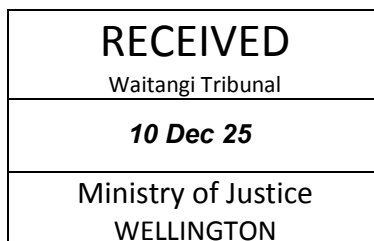
AND

IN THE MATTER OF

a claim by **Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuia Hata** (WAI 2872)

MEMORANDUM OF COUNSEL FILING EVIDENCE FOR WAI 2872

Dated on this 28th day of November 2025



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TĒNĀ E TE TARAIPUNARA:

Introduction

1. This Memorandum of Counsel is filed for and on behalf of **Wai 2872** – a claim by Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuaia Hata for and on behalf of themselves, their whānau, hapū, iwi, and te iwi Māori.

(“the Claimants”)

Background

2. In Memorandum-Directions dated 31 October 2025, her Honour, Judge Reeves directed claimants to file hearing two briefs of evidence and summaries by 5 pm, Friday 28 November 2025.¹

Filing Briefs of Evidence

3. Counsel accordingly file the following evidence to be presented at Hearing Week 3 from 4-8 May 2026:
 - 3.1 The Brief of Evidence of Carrie Stoddart-Smith;
 - 3.1.1 Index and Appendices A, B and C to the Brief of Evidence of Carrie Stoddart-Smith.
 - 3.2 The Brief of Evidence of Dr Jessica Hutchings;
 - 3.2.1 Appendix A to the Brief of Evidence of Dr Jessica Hutchings.
 - 3.3 The Brief of Evidence of Professor Elizabeth Jane Kelsey;
 - 3.3.1 Index and Appendices A, B, C, D, E, F, G, H, I, J, K to the Brief of Evidence of Elizabeth Jane Kelsey.

¹ Wai 2700, 2.6.9(b).

Oral presentation of evidence

4. Counsel understand that the Tribunal reserves the right to choose which witnesses will be presenting their evidence orally at upcoming hearings. The Claimants wish to indicate that due to the interwoven nature of the evidence filed with this memorandum, if the Tribunal seeks to hear from the 3 witnesses, that they present together, as a panel.

DATED at Rotorua this 28th day of November 2025



Annette Sykes



Kalei Delamere-Ririnui



Maia Te Hira

Counsel for the Claimants