

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL

Wai 2200
Wai 113A (part)
Wai 113F
Wai 113H
Wai 113i
Wai 113J
Wai 757

In the Matter of the Treaty of Waitangi Act 1975

And

In the Matter of the Porirua ki Manawatū District Inquiry
(Wai 2200)

And

In the Matter of a claim by Korey Gibson on behalf of Ngāti
Hapahapai ki Mangāmāunu o Ngāti Huia ki
Poroutāwhao (Wai 113A)

And

In the Matter of a claim by Wayne Kiriona on behalf of
Ngāti Huia ki Matau (Wai 113F)

(Continued overleaf...)

**Memorandum of Counsel Filing Joint Claimant Specific Closing Submissions
and Seeking Leave to file out of Time**

Dated 12 January 2026

Mahony Horner Lawyers
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Waitangi Tribunal

12 Jan 2026

Ministry of Justice
WELLINGTON

And

In the Matter

of a claim by Hiram Tamihana on behalf of Ngāti Huia ki to Poroutāwhao (Wai 113H)

And

In the Matter

of a claim by Shane Royal on behalf of Ngāti Kikopiri (Wai 113i)

And

In the Matter

of a claim by Larry Parr on behalf of Ngāti Hikitunga (Wai 113J)

And

In the Matter

of a claim by Wayne Kiriona on behalf of himself and Ngāti Raukawa te Au ki te Tonga (Wai 757)

TĒNĀ E TE TARAIPUUNARA
MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following five hapū of Ngāti Huia ki Horowhenua:
 - a. Wai 113A (part), a claim by Korey Gibson on behalf of Ngāti Hapahapai (sometimes referred to as Ngāti Hapahapae);
 - b. Wai 113F, a claim by Wayne Kiriona on behalf of Ngāti Huia ki Matau;
 - c. Wai 113H, a claim by Hirma Tamihana on behalf of Ngāti Huia ki Poroutawhao;
 - d. Wai 113J, a claim by Larry Parr on behalf of Ngāti Hikitunga;
 - e. Wai 113i, a claim by Shane Royal on behalf Ngāti Kikopiri; and
 - f. Wai 757, a claim by Wayne Kiriona on behalf of Ngāti Raukawa te Au ki te Tonga.

(Claimants).

2. On 1 December 2025, her Honour, Kaiwhakawā Matua Dr C L Fox, directed that closing submissions for the Ngāti Raukawa and Affiliated Groups Phase are to be filed no later than 5.00 pm, 19 December 2025.¹ In an email from the Tribunal Registry team dated 19 December 2025, Her Honour directed that no extensions for filing or amending specific closing submissions in the Ngāti Raukawa and Affiliated Groups phase beyond 13 January 2026 will be granted.²
3. Counsel and the Claimants were unable to finalise the claimant specific closing submissions by the 19 December 2025 deadline and have made great efforts to complete the submissions prior to the 13 January 2026 date.

¹ Wai 2200, #2.6.307 – Memorandum-Directions (no. 449) of Chief Judge Dr C L Fox Concerning Amended Filing Deadlines for the Ngāti Raukawa and Affiliated Groups Phase and the Forward Programme for the Wider Inquiry Phase

² Tribunal Registry Team, *Wai 2200 - Porirua ki Manawatū Inquiry*, dated 19 December 2025, received at 4:44 pm.

Accordingly, Counsel file the joint claimant specific closing submissions, and accompanying appendix on behalf of the Claimants.

4. Counsel apologise for the delay in filing the claimant specific closing submissions, and respectfully seek leave to file the submissions out of time, and for their submissions to be placed on the record.
5. It is submitted that the prejudice accrued as a result of the delay in filing is outweighed by the prejudice that will be experienced by the Claimants should their claimant specific closing submissions not be accepted for filing.

Dated at Te-Whanganui-a-Tara this 12th day of January 2026

A handwritten signature in blue ink, appearing to read 'R M A Soriano', written in a cursive style.

R M A Soriano
Counsel for the Claimants