

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

**Wai 3300  
Wai 1662  
Wai 1684  
Wai 2389  
Wai 2424  
Wai 2945**

**In the Matter** of the Treaty of Waitangi Act 1975

**And**

**In the Matter** of the Tomokia ngā tatau o Matangireia –  
the Constitutional Kaupapa Inquiry (Wai  
3300)

**And**

**In the Matter** of a claim by Leah Wright on behalf of  
herself, and on behalf of the Muriwhenua  
Hapū Collective (Wai 1662)

**And**

**In the Matter** of a claim by Doreen Puru, Anna Kahukura  
Hotere, the late Louie Katene, Emma  
Torckler, and William Puru on behalf of  
themselves, Te Hoia, Ngāti  
Rangimatamomoe and Ngāti  
Rangimatakaka (Wai 1684)

(Continued overleaf...)

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**MEMORANDUM OF COUNSEL FILING FURTHER MATERIAL**

**Dated 27 January 2026**

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**Mahony Horner Lawyers**

Counsel: Rox Soriano / Richard Gayfer

PO Box 24515

Wellington 6142

04 974 4036 / 04 974 4206

[rox.soriano@mhlaw.co.nz](mailto:rox.soriano@mhlaw.co.nz) / [richard.gayfer@mhlaw.co.nz](mailto:richard.gayfer@mhlaw.co.nz)

**RECEIVED**

Waitangi Tribunal

**27 Jan 26**

Ministry of Justice  
WELLINGTON

**And**

**In the Matter**

of a claim by the late Tahua Murray, the late Rapine Hona, the late Louis Hohaia, the late Charlie Hikuwai, the late Mereihe Kool, Kawhena Paul, Jhanitra Rhesa Gavala, Christina (Kiri) Batty and Melanie Joy Beauchamp on behalf themselves and Ngāti Ruamahue (Wai 2389)

**And**

**In the Matter**

of a claim by Maiki Marks, on behalf of herself, Harry Mahanga and Kitty Mahanga-Nisbet (Wai 2424)

**And**

**In the Matter**

of a claim by Raewyn Louise Kapa, for and on behalf of the whānau of Te Rito Foundation (Wai 2945)

**TĒNĀ E TE TARAIPUUNARA**  
**MAY IT PLEASE THE TRIBUNAL**

1. This Memorandum of Counsel is filed on behalf of:
  - a. Wai 1662, a claim by Leah Wright on behalf of herself, and on behalf of the Muriwhenua Hapū Collective;
  - b. Wai 1684, a claim by Doreen Puru, Anna Kahukura Hotere, the late Louie Katene, Emma Torckler, and William Puru on behalf of themselves, Te Hoia, Ngāti Rangimatamomoe and Ngāti Rangimatakaka;
  - c. Wai 2389, a claim by a claim by the late Tahua Murray, the late Rapine Hona, the late Louis Hohaia, the late Charlie Hikuwai, the late Mereihe Kool, Kawhena Paul, Jhanitra Rhesa Gavala, Christina (Kiri) Batty and Melanie Joy Beauchamp on behalf themselves and Ngāti Ruamahue;
  - d. Wai 2424, a claim by Maiki Marks, on behalf of herself, Harry Mahanga and Kitty Mahanga-Nisbet; and
  - e. Wai 2945, a claim by Raewyn Louise Kapa, for and on behalf of the whānau of Te Rito Foundation.

**(Claimants)**


2. In memorandum-directions dated 19 December 2025, her Honour Chief Judge Fox directed claimant counsel to file specified further material in relation to te Wānanga Tuaono by no later than 27 January 2026.<sup>1</sup>
3. In accordance with her Honour's directions, counsel file with this memorandum the following documents:
  - a. the constitution on behalf of the Muriwhenua hapū partially authored by Leah Wright (Wai 1662); and

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<sup>1</sup> Wai 3300, 2.6.79.

- b. the speaking notes of Kawhena Paul (Wai 2389).
4. Although not specifically requested in her Honour's directions, counsel also file the following additional material that was presented at the wānanga, in the hope that this may be helpful to parties and the Tribunal:
  - a. Presentation of Leah Wright (Wai 1662);
  - b. Speaking notes of Doreen Puru (Wai 1664);
  - c. Presentation and speaking notes of Raewyn Kapa (Wai 2945).
5. Finally, despite best efforts, counsel have not yet been able to obtain a digital copy of the PowerPoint presentation and speaking notes used by Ms Maiki Marks when she presented on behalf of Wai 2424 on 4 December. Counsel understand that hard copies of these were distributed to the panel, Tribunal staff and Crown counsel at the wānanga. However, should the Tribunal require them, counsel will endeavour to procure and file an electronic copy of Ms Marks' presentation and speaking notes.

**Dated** at Te-Whanganui-a-Tara this 27th day of January 2026



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**R M A Soriano and R K Gayfer**  
**Counsel for the Claimants**