

I TE ROOPU WHAKAMANA I TE TIRITI
IN THE WAITANGI TRIBUNAL

WAI 3300

WAI 2214

IN THE MATTER of the Treaty of Waitangi Act 1975

AND Tomokia ngā tatau o Matangireia - the Constitutional
Kaupapa Inquiry

AND the Wai 2214 claim by Margaret Mutu on behalf of
herself, Te Rūnanga-a-Iwi o Ngāti Kahu Charitable
Trust and Ngāti Kahu

MEMORANDUM OF COUNSEL

Dated this 27th day of January 2026

RECEIVED

Waitangi Tribunal

28 Jan 26

Ministry of Justice
WELLINGTON



Level 5, 50 Kitchener Street
Po Box 461
AUCKLAND

Solicitor Acting: Coral Panoho-Navaja / Neuton Lambert / Jack C Alexander
Ph. (09) 379 5026

E mail: coral@wpalawyers.co.nz / neuton@wpalawyers.co.nz /
jack@wpalawyers.co.nz

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed for and on behalf of the Wai 2214 claim by Professor Margaret Mutu on behalf of herself, Te Rūnanga-a-Iwi o Ngāti Kahu Charitable Trust and Ngāti Kahu (“the **Claimants**”).
2. In Memorandum-Directions dated 19 Hakihea 2025, Her Honour, Kaiwhakawā Matua Dr Fox invited parties in attendance at the unrecorded wānanga held on the evening of Wednesday 3 December (“**Unrecorded Wānanga**”) to file any documents they consider relevant and seek leave to have them placed on the record of inquiry no later than 5pm, Tuesday 27 January 2026.¹
3. Professor Mutu attended the Unrecorded Wānanga on behalf of the Claimants and now wishes to file supplementary comments on the basis that they are relevant to the Wānanga ā-Rohe Phase of the Inquiry and provide further detail on the position of Ngāti Kahu which it is hoped will be of assistance to the Tribunal prior to concluding this phase of the inquiry.
4. Accordingly, counsel now file with this Memorandum, a Further Statement of Position of Professor Margaret Mutu dated 13 November 2025 on behalf of the Claimants and respectfully seek leave of the Tribunal for the same to be placed on the Wai 3300 Record of Inquiry.

Dated at Auckland this 27th day of January 2026



C Panoho-Navaja / N Lambert / J Alexander

Counsel for the Claimants

¹ Wai 3300 #2.6.079 at [4].