

IN THE WAITANGI TRIBUNAL

WAI 2700
WAI 475

UNDER

The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

The Mana Wahine Kaupapa
Inquiry (Wai 2700)

AND

IN THE MATTER OF

A claim by Wanda Brljevich on
behalf of herself and for the
benefit of her whānau and on
behalf of her iwi Ngāti Huarere ki
Whangapoua

MEMORANDUM OF COUNSEL

DATED 12 FEBRUARY 2026

Te Mata Law Ltd
Barristers and Solicitors
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RECEIVED

Waitangi Tribunal

13 Feb 26

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Wanda Brljevich the named claimant for Wai 475 (“the claimant”), who brings this claim on behalf of herself and for the benefit of her whānau and iwi Ngāti Huarere ki Whangapoua.
2. By way of Memorandum-Directions of her Honour Judge Reeves dated 15 December 2025, Counsel were directed to file briefs of evidence for Hearing Week Two and Hearing Week Three by 12 February 2026¹.
3. Accordingly, counsel attaches for filing the following documents:
 - a. Brief of Evidence of Wanda Brljevich dated 12 February 2026.
 - b. Index and Appendices for the Brief of Evidence of Wanda Brljevich.
 - c. Summary Brief of Evidence of Wanda Brljevich dated 12 February 2026.
4. The claimant is not seeking to present her evidence in person and will be available to answer any questions submitted in writing.

¹ Wai 2700, #2.6.13(a), Appendix A: Updated filing milestones for the Mana Wahine Kaupapa Inquiry (15 December 2025).

DATED at Auckland this 12th day of February 2026

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David Martin Stone

Catherine Leuga



Sophie Gordon

Counsel for the claimant

TO: The Registrar, Waitangi Tribunal; Crown Law Office and those on the notification list for the Wai 2700 Mana Wahine Kaupapa Inquiry