

IN THE WAITANGI TRIBUNAL

Wai 2700

Wai 3012

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Mana Wāhine Kaupapa Inquiry

BY Moerangi Potiki, on behalf of herself
and her whānau, and hapū and iwi of
Ngāti Whakaue mai Maketū

MEMORANDUM OF COUNSEL FILING

BRIEF OF EVIDENCE

Dated: 12 February 2026

RECEIVED

Waitangi Tribunal

13 Feb 26

Ministry of Justice
WELLINGTON

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Counsel Assisting: Nakita Wiperi

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel (“MoC”):
 - a. is filed on behalf of Moerangi Potiki, on behalf of herself and her whānau, hapū, and iwi of Ngāti Whakaue mai Maketū (“the Claimants”); and
 - b. files the Brief of Evidence (“BoEs”) for the Rangatiratanga Pou to be held on 11 March – 15 March 2026 for;
 - i. Joint Brief of Evidence (“JBoE”) of Moerangi Potiki and Liam Tapsell;
 - ii. JBoE of Ngahu Potaka and Billie-Jean Potaka Ayton;
 - iii. Tere Tapsell;
 - iv. Veronica Edwards;
 - v. Marena Gregory;
 - vi. Tane Bennett; and
 - vii. Ellie Tapsell.

2. In Memorandum Directions dated 15 December 2025, Presiding Officer Judge Reeves directed all BoEs and accompanying written summaries for the Rangatiratanga Pou to be filed by 12 February 2026.¹

3. As the Claimant’s evidence addresses issues relating to the Rangatiratanga Pou of the Inquiry, they have indicated a preference to present in Hearing Week Three in te Tai Tokerau, subject to the hearing plan and final confirmations of the Tribunal.

Dated: 12 February 2026



Janet Mason
Counsel Acting

¹ Wai 2700, #2.6.013(a).