

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 2700  
WAI 3003  
WAI 2717

KEI RARO I TE MANA O

te ture o te Tiriti o Waitangi 1975

I TE TAKE O

te pakirehua Wai 2700 mō ngā kerēme e pā ana ki te Mana o te Wahine

Ā

I TE TAKE O

tētahi kerēme nā Nora Rameka, rātou ko Rukuwai Allen ko Heeni Brown (Wai 3003)

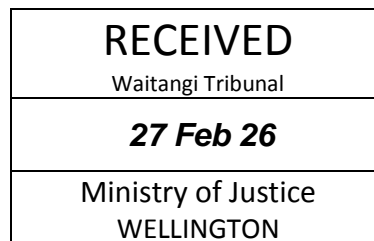
I TE TAKE O

tētahi kerēme nā Bonnie Jade Kake mō ngā wāhine Māori katoa (Wai 2717)

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He Manatu Rōia  
I tēnei rā, i te 27 o Pēpuere 2026

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I Peters / A Herewini / A Evans

## TĒNĀ, E TE TARAIPUUNARA

1. Kua whakakōnaetia tēnei manatu rōia mā ngā Kaikerēme e whai ake nei:

(a) Nora Rameka rātou ko Rukuwai Allen ko Heeni Brown (Wai 3003);  
me

(b) Jade Kake (Wai 2717)

**(“ngā Kaikerēme”)**

*This Memorandum of Counsel is filed on behalf of the following claimants:*

*(a) Nora Rameka, Rukuwai Allen and Heeni Brown (Wai 3003); and*

*(b) Jade Kake (Wai 2717)*

**(“the Claimants”)**

2. E whakautu ana tēnei manatu rōia i te pānui whakahau a te Kaiwhakawā nō te rā 15 o Tihema 2025, i tohua ngā rōia kia tuku i ngā whāititanga o te tauākī whakaraupapa nawe mō te toenga o ngā take o tēnei ruku tātari hei te **5 karaka, te 27 o Pēpuere 2026**.

*This Memorandum is filed in response to Memorandum-Directions dated 15 December 2025 which directed counsel to file further particularised statements of claim for the remainder of the inquiry issues by **5pm, 27 February 2026**.<sup>1</sup>*

3. Kua ngana ngā rōia ki te whakatutuki i ēnei tohutohu, arā, ki te panoni, ki te whāiti i ngā kerēme tauākī whakaraupapa nawe ā ngā Kaikerēme i te wā kua tohua e Kaiwhakawā Reeves. Ā, e haere tonu ana ēnei mahi i tēnei wā tonu, heoi anō, ahakoa te ngana, kāhore āno kia tutuki i ēnei

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

mahi i te wā kua tohua.

*Counsel have made best efforts to comply with these directions, that is, to amend and particularise the Claimants' statements of claim by the deadline set by her Honour Judge Reeves. This work remains underway and, despite best efforts, counsel have been unable to complete this work by the due date.*

4. E mārama ana ki ngā tohutohu a te Kaiwhakawā kia whai ngā Kaikerēme me ngā rōia i ngā tohutohu me te wātaka kua whakatōria e te Taraipiunara kia tutuki pai i ngā whāinga a te Taraipiunara mō tēnei ruku tātari. Nō reira, e whakapāha atu nei i tēnei tono, ehara i te mea he tono kaupare i ērā āhuatanga.

*Counsel are cognisant and respectful of her Honour's directions that claimants and counsel adhere to the timetable set by the Tribunal to ensure that the Tribunal's objectives for this inquiry can be met. Accordingly, this request is made sincerely, and is not one made in ignorance, nor with an intention to detract from those objectives.*

5. Heoi anō, e kimi ana ēnei rōia i tētahi whakaroatanga ki te tuku i ngā whāititanga o ngā tauākī whakaraupapa nawe mō ngā take toenga o tēnei ruku tātari mō ngā Kaikerēme, i runga i ngā āhuatanga e whai ake nei:

*As such, Counsel respectfully seek a brief extension to file particularised statements of claim for the remaining issues in this inquiry for the Claimants on the following bases:*

- (a) Me whai wā ki te whakaoti i ngā tuhinga, kia whiwhi hoki i ngā tohutohu a ngā Kaikerēme mō ngā tauākī whakaraupapa hou;

*Further time is required to finalise the documents and take instructions from the Claimants on the final amended statements of claim; and*

- (b) Kua pokea hoki ngā rōia e ētahi āhuaranga i roto i ēnei rangi tata nei i runga i te māuiuitanga, te noho hōhipera nōki o ētahi whānau, me te māuiui kua pā ki ētahi o a mātou kaimahi, kua whakataimaha i tā ēnei rōia āheinga ki te tutuki i tēnei angawā.

*Counsel's workload has also been affected by a number of events in recent days including the illness and hospitalisation of close whānau members, and staff illness, both of which have impacted Counsel's ability to meet the current deadline.*

6. I runga i ēnei āhuatanga, e kimi ana ēnei rōia, i runga anō i te whakaute, he wāhi whakaroatanga ki te tuku i ngā Kaikerēme whakawhāiti o te tauākī whakaraupapa mō ngā take toenga o tēnei ruku tātari hei te Wenerei e tū mai nei, te **5 karaka, 4 o Māehe 2026**. Ahatia tēnei tono, ka ngana ēnei rōia ki te tuku i ngā tuhinga i mua i tēnei rā mēnā ka taea.

*On these bases, Counsel respectfully seek an extension to file the Claimants' particularised statements of claim by **5pm, Wednesday 4 March 2026**. Notwithstanding this request, Counsel will endeavour to file prior to this date if possible.*

7. E tāpae ana ēnei rōia i runga i te whakaute, ki te whakaae te Kaiwhakawā ki tēnei tono, kāhore he tino whakahāweatanga ka pā ki tētahi atu.

*Counsel submit that should the request sought be granted, no significant prejudice will accrue to any other party.*

I TĒNEI RĀ, i Pōkeno, i te rā 27 o Pēpuere 2026



Ihipera Peters / Aroha Herewini / Amber Evans  
Ngā rōia mō ngā Kaikerēme