

**IN THE WAITANGI TRIBUNAL  
KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI**

**WAI 745/1308  
WAI 2700**

**IN THE MATTER** the Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF** The Mana Wāhine Kaupapa Inquiry

**AND**

**IN THE MATTER OF** A claim filed by Luana Pirihi and the late Paki Pirihi on behalf of Patuharakeke (Wai 745) and a claim filed by Ngawaka Pirihi and others on behalf of the owners of Pukekauri 1B1, 1B2, 1B3, 1B4 and 1B5, and Takahiwai 4C, 4D1, 4E, 7A, 7B2 and 7C (Wai 1308)

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**MEMORANDUM OF COUNSEL**

*Dated this 26<sup>th</sup> day of February 2026*

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<b>RECEIVED</b> Waitangi Tribunal
<b>27 Feb 26</b>
Ministry of Justice WELLINGTON

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**This document is filed by:-**



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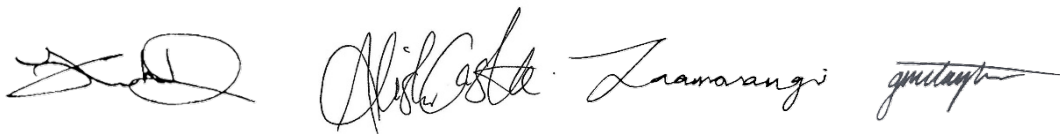
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## TĒNĀ E TE TARAIPIUNARA

1. This Memorandum of Counsel is filed on behalf of Luana Pirihi and the late Paki Pirihi on behalf of the Patuharakeke Te Iwi Trust and Patuharakeke hapū (Wai 745) and Ngawaka Pirihi on behalf of the owners of Pukekauri and Takahiwai land blocks (Wai 1308) (“**the Claimants**”).
2. On 15 December 2025, Her Honour Judge Reeves issued her Memorandum Directions concerning the vacation of hearing week two (previously to be held in February) and the reallocation of this hearing time to April.<sup>1</sup>
3. Her Honour provided an updated filing timetable to reflect this change at Appendix A.<sup>2</sup> This timetable indicated that Counsel is to file indications of the Claimants’ particular claim issues for the remainder of the inquiry tomorrow, Friday 27 February 2026.
4. Counsel have only recently received instructions from the Claimants regarding the particularisation of the claim, and we regretfully inform the Tribunal that this timeframe has been insufficient to complete the Amended Statement of Claim.
5. Counsel respectfully seek a short extension to Wednesday 4 March to file the Claimants’ Amended Statement of Claim. We do not anticipate any prejudice to other parties should this extension be granted.
6. Additionally, the Claimants’ participation in hearing weeks two and three is limited; we have indicated that their evidence will be heard on the papers, pursuant to the Memorandum of Coordinating Counsel filed by Ms Roughton on Friday 20 February 2026. The Claimants’ evidence will be in scope for the purpose of Pouhine Rangatiratanga and further particularisation of the remaining inquiry in the Amended Statement of Claim.

**DATED** at Auckland this 26<sup>th</sup> day of February 2026



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**Kelly Dixon / Alisha Castle / Taamorangi Hartley / Grace Taylor**  
Counsel for the Wai 745/1308 Claimants

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<sup>1</sup> Wai 2700, #2.6.13.

<sup>2</sup> At [31], (Wai 2700, #2.6.013(a)).