

IN THE WAITANGI TRIBUNAL

**WAI 2700
WAI 2125
WAI 2057
WAI 1900
WAI 2839
WAI 2354**

**UNDER
AND**

The Treaty of Waitangi Act 1975

IN THE MATTER OF

The Mana Wahine Kaupapa Inquiry
(Wai 2700)

AND

IN THE MATTER OF

A claim by Rosemarie Stone (Wai 2851); A claim by Peggy Nelson (Wai 2125); A claim by Joe Tarrant (Wai 2057); A claim by Isobel Mahara (Wai 1900); A claim by Michelle Wiremu (Wai 2839); and A claim by Simon Iehu Moetara and Cora Iehu Moetara (Wai 2354).

MEMORANDUM OF COUNSEL

DATED 27 FEBRUARY 2026

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Waitangi Tribunal

27 Feb 26

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

Introduction

1. This memorandum of counsel is filed on behalf of the named claimants for Wai 2851, Rosemarie Stone; Wai 2125, Peggy Nelson; Wai 2057, Joe Tarrant; Wai 1900 Isobel Mahara; Wai 2839, Michelle Wiremu; and, Wai 2354 Simon Iehu Moetara and Cora Iehu Moetara (“the claimants”).

Wai 2851

2. Wai 2851 previously filed a statement of claim for participation in the Mana Wāhine Inquiry on 21 September 2018.¹
3. In memorandum-directions dated 15 December 2025 Her Honor Judge Reeves directed claimants to file any amended statements of claim by 5 pm, Friday 27 February 2026.²
4. Counsel respectfully seeks leave for a brief extension until Friday 6 March to file an amended statement of claim on behalf of the claimant on the grounds that she has been unwell and unable to provide instructions.

Wai 2151, 2057, 1900, 2839 and 2354

5. Counsel also seek an extension until Friday 6 March to file an amended statement claim on behalf of the following claims on the grounds that it has been difficult to receive instructions:
 - a. Wai 2125, Peggy Nelson;³
 - b. Wai 2057, Joe Tarrant;⁴

¹ Wai 2851, #1.1.1.

² Wai 2700 #2.6.13(a).

³ Wai 2125, #1.1.1.

⁴ Wai 2057, #1.1.1(c).

- c. Wai 1900 Isobel Mahara;⁵
- d. Wai 2839, Michelle Wiremu;⁶ and
- e. Wai 2354, Simon Iehu Moetara and Cora Iehu Moetara.⁷

Dated at Auckland this 27th day of February 2026



David Stone
Counsel for the Claimant

Catherine Leauga

Sophie Gordon

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

⁵ Wai 1900, #1.1.1(a).

⁶ Wai 2839, #1.1.1.

⁷ Wai 2354, #1.1.1(c).