

IN THE WAITANGI TRIBUNAL

WAI 2700  
WAI 2188  
WAI 2236  
WAI 2709  
WAI 3159

IN THE MATTER OF

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 Allen Webb for Kanihi Umutahi me etehi  
atu Hapū o Ngāruahine (Wai 2188)

AND

IN THE MATTER OF

a claim by Awhina Muriwai Hill (deceased), Peter Hill  
(deceased) and Erina Clark on behalf of the  
descendants of Priscilla Muriwai Dennison (nee  
Flutey) (Wai 2236)

AND

IN THE MATTER OF

a claim by Rosaria Hotere for and on behalf of  
herself, her whanau and Te uri o Hau (Wai 2709)

AND

IN THE MATTER OF

a claim by Muriwai Jones (deceased), Te Aururangi  
Davis and Hohepa Maxwell on behalf of Ngai Tai and  
Ririwhenua Hapū (Wai 3159)

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**MEMORANDUM OF COUNSEL**

Dated this day 2<sup>nd</sup> day of March 2026

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**RECEIVED**

Waitangi Tribunal

**2 Mar 26**

Ministry of Justice  
WELLINGTON



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**Counsel Acting: Eve Kahuwaero Rongo**

**MAY IT PLEASE THE TRIBUNAL**

1. This Memorandum of Counsel is filed on behalf of the following claims
  - (a) a claim by Allen Webb for Kanihi Umutahi me etehi atu Hapū o Ngāruahine (Wai 2188);
  - (b) a claim by Awhina Muriwai Hill (deceased), Peter Hill (deceased) and Erina Clark on behalf of the descendants of Priscilla Muriwai Dennison (nee Flutey) (Wai 2236);
  - (c) a claim by Rosaria Hotere for and on behalf of herself, her whanau and Te uri o Hau (Wai 2709); and
  - (d) a claim by Muriwai Jones (deceased), Te Aururangi Davis and Hohepa Maxwell on behalf of Ngai Tai and Ririwhenua Hapū (Wai 3159).
2. 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.<sup>1</sup>
3. Counsel respectfully seeks leave for a brief extension until Friday 6 March to file amended statements of claim on behalf of the above-named claims on the grounds that instructions are still forthcoming. The Claimants have been having hui with their claimant community and are working on finalising their draft amended statement of claim.
4. Counsel will endeavour to file prior to this date if possible.

**DATED** at Paraparaumu this 2<sup>nd</sup> day of March 2026



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**Eve Kahuwaero Rongo**

Claimant Counsel

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<sup>1</sup> Wai 2700, #2.6.13(a)