IN THE WAITANGI TRIBUNAL

Wai 2700	**Wai 1504**
Wai 1673	**Wai 1541**
Wai 1917	**Wai 3011**
Wai 2931	**Wai 3220**
Wai 3012	**Wai 2118**

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

and others…

MEMORANDUM OF COUNSEL
FILING BRIEF OF EVIDENCE SUMMARIES

Dated: 13 February 2026

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Counsel Acting: Janet Mason
Counsel Assisting: Nicholas Johnson

RECEIVED
Waitangi Tribunal
16 Feb 26
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel ("MoC"):

a. is filed on behalf of:

i. Denise Messiter, on behalf of herself, her whānau, hapū, iwi, whānau whānui, and whāngai;

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

iii. Te Amohia McQueen, on behalf of herself, her whānau, hapū, iwi, whānau whānui, and whāngai;

iv. Mihirawhiti Searancke, Renee Hinerangi Searancke, Doeen Hinemania Richards, Kingi Tuheka Hetet, Boyce Te Wharemaru Ihakara II Taylor and Sharon Bettina Searancke Rakena and others;

v. Louisa Te Matekino Collier, and Rihari Richard Takuiora Dargaville, on behalf of themselves, and Ngāti Kawau Iti;

vi. Paula Ormsby, on behalf of herself, the Wāhine Toa Chapter of the Mongrel Mob Kingdom, and Priority Whānau, including, Māori women and their children associated with other gangs;

vii. Teina Boasa-Dean on behalf of her whānau, hapū, iwi, hānau whānui and whāngai (together "the Claimants").

b. files summaries of briefs of evidence ("BoEs");

c. seeks the repeal of the following BoE summaries:

i. Summary of Joint Brief of Evidence of Moerangi Potiki and Liam Tapsell, dated 12 February 2026;

ii. Summary of Joint Brief of Evidence of Ngahu Potaka and Billie Jean Potaka Ayton, dated 12 February 2026;

iii. Summary of the Joint Brief of Evidence of Louisa Te Matekino Collier and Rhonda Aorangi Kawiti, dated 12 February 2026;

iv. [Summary of] Brief of Evidence of Denise Messiter, dated 12 February 2026; and

d. apologises for the late filing of the BoE summaries and seeks leave for the same.

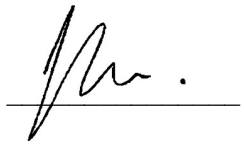
2. In Memorandum Directions ("MD"), Her Honour Judge Reeves directed all witnesses to provide written summaries of their evidence.[1]

3. Accordingly, Counsel files the written summaries of the Claimants' BoEs.

4. A number of summaries previously filed were incorrect. Counsel requests that they be removed from the record, and replaced with the versions now filed with this MoC.

5. Counsel sincerely apologises for the late filing of these summaries and respectfully seeks leave for the same.

Dated 13 February 2026



Janet Mason
Counsel Acting

[1] Wai 2700, #2.6.14(a).