I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 2700
WAI 3003

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)

He Manatu Rōia
I tēnei rā, i te 17 o Pēpuere 2026

RECEIVED
Waitangi Tribunal
18 Feb 26
Ministry of Justice
WELLINGTON

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TĒNĀ, E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

1. Kua whakakōnaetia tēnei manatu rōia mā Nora Rameka rātou ko Rukuwai Allen ko Heeni Brown (Wai 3003) (”**ngā Kaikerēme**”).

   *This Memorandum of Counsel is filed on behalf of Nora Rameka, Rukuwai Allen and Heeni Brown (Wai 3003) (“**the Claimants**”).*

2. Nā te pānui whakahau a Kaiwhakawā Reeves nō te rā 15 o Tīhema 2025 i tohu i ngā rōia me ngā kaikerēme kia tuku i ngā kōrero taunaki mā te nohoanga tuarua me te nohoanga tuatoru hei te **12 o Pēpuere 2026**.[1]

   *By way of Memorandum-Directions of her Honour Judge Reeves dated 15 December 2025, Counsel were directed to file briefs of evidence for Hearings Two and Three by **12 February 2026**.*

3. Nā tētahi manatu rōia nō te rā 10 o Pēpuere 2026 kimi ai ēnei rōia tētahi whakaroatanga ki te tuku i ngā kōrero taunaki mō ngā Kaikerēme hei te **12pm, 17 Pēpuere 2026**. I whakaaetia e Kaiwhakawā Reeves ki te tono nei.

   *By way of a memorandum dated 10 February 2026, Counsel sought an extension to file evidence for the Claimants by **12pm, 17 February 2026**. This extension was granted by her Honour Judge Reeves*.

4. Nō reira, e tuku ana ēnei rōia me tēnei manatu i ngā kōrero taunaki me ōna whakarāpopoto mō ngā kaikōrero e whai ake nei:

   Accordingly, Counsel file with this memorandum the briefs of evidence and associated summaries for the following kaikōrero:

   (a) Rukuwai Allen;

   (b) Arohanui Allen; me

[1] Wai 2700, #2.6.13(a), *Appendix A: Updated filing milestones for the Mana Wahine Kaupapa Inquiry* (15 December 2025).

(c) Heeni Te Mate Kōiwi.

5. E whakapāha ana ēnei rōia mō te tōmuritanga o tēnei tuku, ā, e inoi atu ana kia whakaae mai te Rōpū Whakamana i te Tiriti o Waitangi ki tēnei kōnaetanga.

Counsel apologise for the slight delay in filing and respectfully seek leave for same.

I TĒNEI RĀ, i Pōkeno, te rā 17 o Pēpuere 2026

Aroha Herewini / Amber Evans
Ngā Rōia mō Ngā Kaikerēme