IN THE WAITANGI TRIBUNAL
THE MANA WĀHINE KAUPAPA INQUIRY

WAI 2700
WAI 88 & 89
WAI 1837
WAI 1928
WAI 2257

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Mana Wāhine Kaupapa Inquiry (WAI 2700)

AND a claim by the late Te Pehi Parata, Ani Parata, Darrin Parata and Damian Parata for and on behalf of Te Āti Awa Marae Committee, other whānau and hapū of Te Āti Awa/Ngātiawa ki Waikanae, and descendants of Te Kakakura Wi Parata Waipunahau (the Kāpiti Island claim) (WAI 88)

AND a claim by the late Te Pehi Parata, Ani Parata, Darrin Parata, Karen Parata, Matthew Love-Parata, Ratapu Nelson Solomon, Sandra Louise Marama Edwards, Lois McNaught, Hauangi Kiwha and Doris Lake for and on behalf of Te Āti Awa Marae Committee, other whānau and hapū of Te Āti Awa/Ngātiawa ki Waikanae, and descendants of Te Kakakura Wi Parata Waipunahau (the Whitireia Block claim) (WAI 89)

AND a claim by Deirdre Nehua for and on behalf of the whānau, hapū and iwi of Te Tai Tokerau (the Whānau and Hapū of Te Tai Tokerau Settlement Issues (Nehua) claim) (WAI 1837)

AND a claim by Gloria Karaitiana on behalf of herself and her whānau (the Descendants of Te Hirawanu (Karaitiana) claim) (WAI 1928)

AND a claim by the late Maruhaeremuri Stirling, Ruiha Edna Stirling, the late Parehuia Herewini-Kahika, and Victoria Edwards-Kora for and on behalf of themselves and in association with the whānau of the hapū Te Whānau a Apanui and Whakatōhea (Te Whānau Apanui Mana Wāhine (Stirling) claim) (WAI 2257)

RECEIVED
Waitangi Tribunal
24 Feb 26
Ministry of Justice
WELLINGTON

MEMORANDUM OF COUNSEL FILING THE SECOND BRIEF OF EVIDENCE OF WHAEA DEIRDRE NEHUA, AND ADDRESSING OTHER MATTERS

Dated 24 February 2026

COUNSEL ACTING
Chris Beaumont | Tekih Veikoso
021 023 72283 | 027 289 2683
chris@tearahilaw.co.nz | tekih@tearahilaw.co.nz
PO Box 138, Ōtaki 5542

TE ĀRAHI LAW
LEGAL SPECIALISTS

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following Claimants:

   (a) The Kāpiti Island and the Whitireia Block claims **(Wai 88 and 89)**;

   (b) The Whānau and Hapū of Te Tai Tokerau Settlement Issues claim **(Wai 1837)**;

   (c) The Descendants of Te Hirawanu (Karaitiana) claim **(Wai 1928)**; and

   (d) Te Whanau Apanui Mana Wāhine (Stirling) claim **(Wai 2257)**.

   ("the Claimants")

2. We refer to the Memorandum-Directions dated 15 December 2025 (Wai 2700, #2.6.13), which set out an updated filing timetable requiring parties to file briefs of evidence and summaries for Hearing Two and Hearing Three by 5pm, Thursday 12 February 2026.[1]

3. On 17 February 2026, Counsel filed a memorandum seeking an extension to file the Claimants' briefs of evidence ("evidence") and summaries ("summary") by 5pm, Friday 27 February 2026.[2] The request was granted, and a new filing deadline was set for **5pm, Monday 23 February 2026**,[3] which was confirmed by email from the Assistant Registrar of the Waitangi Tribunal. Counsel acknowledges the new deadline and thanks the Tribunal for its consideration of the extension sought.

4. Counsel sincerely apologises for filing after the deadline. Our Claimant's evidence was due yesterday; however, our Claimant was in an isolated location without internet access or phone service. After returning home today, counsel was able to obtain further instructions and approval of her evidence today.

OTHER MATTERS

5. **Wai 88/89 –** Instructions have been received from our Wai 88/89 Claimants. Following correspondence with coordinating counsel, it had been indicated that our Claimant would present evidence at Hearing Two. However, our Claimant now confirms that she does not intend to present evidence under the Rangatiratanga Pou, as the matters she wished to address have already been presented in an earlier hearing in a different Inquiry.

---

[1] Wai 2700, #2.6.13(a).
[2] Counsel filed memorandum by email on 17 February 2026 at 12.04pm.
[3] Instructions conveyed by email from the Assistant Registrar of the Waitangi Tribunal on 19 February 2026 at 11.07am.

6. Our Claimants' supporting whānau member, who had also been scheduled to present at Hearing Two, will instead present her evidence under the **Whakapapa/Whānau Pou**. Counsel will file that evidence on the deadline set for that Pou.

7. **Wai 1928 and Wai 2257 –** Our Wai 1928 Claimant had been scheduled to present evidence in person. However, further instructions have been received that she wishes for her evidence to be taken as read. In respect of our Wai 2257 Claimant, her evidence will remain as read. Counsel will file their briefs of evidence and their summaries **by 5pm, Friday 10 April 2026.**

FILING THE SECOND BRIEF OF EVIDENCE OF WHAEA DEIRDRE

8. Counsel confirms that the evidence of Whaea Deirdre aligns with the Rangatiratanga Pou and Issue 1 of the Tribunal Statement of Issues (Wai 2700, #1.4.4).

9. **Whaea Deirdre intends to present her evidence in person at Hearing Two**, as indicated in the amended memorandum filed by coordinating counsel.[4] Counsel, therefore, attaches the **unsigned second brief of evidence of Whaea Deirdre.**

DATED this 24th day of February 2026

Chris Beaumont
Counsel for the Claimants

Tekih Veikoso
Counsel for the Claimants

[4] Memorandum of Coordinating Counsel filing draft hearing plans for Hearing Weeks Two and Three (Rangatiratanga Pou), in which our Claimant (Wai 1837) is listed in Appendix B of the draft hearing plan filed by email to the Waitangi Tribunal on Monday 23 February 2026 at 9.29am.