

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 6 o Māehe 2026

RECEIVED

Waitangi Tribunal

9 Mar 26

Ministry of Justice
WELLINGTON



PO Box 133102
Auckland 1146
kauparelaw.co.nz
aro@kauparelaw.co.nz
amber@kauparelaw.co.nz
I Peters / A Herewini / A Evans

TĒNĀ, E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

1. Kua whakakōnaetia tēnei manatu rōia mā te kerēme Wai 3003, he kerēme nā Nora Rameka rātou ko Rukuwai Allen ko Heeni Brown (“ngā Kaikerēme”).

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

2. Nō te rā 4 Māehe 2026 tohutohu ai i te pānui whakahau a te Kaiwhakawā Reeves ngā rōia kia tuku i ngā tāpaetanga whakataki me tana whakarāpopoto hei te **5 karaka, te 6 o Māehe 2026**.¹

By way of Memorandum-Directions of her Honour Judge Reeves dated 4 March 2026, Counsel were directed to file opening submissions and a summary of same by 5pm, 6 March 2026.

3. Ahatia te ngana, tē taea ēnei rōia te tuku tāpaetanga whakataki a Ngā Kaikerēme i mua i te angawā. Nō reira, e kimi ana ēnei rōia i tētahi whakaroatanga ki te tuku i ngā tāpaetanga whakataki mō ngā Kaikerēme, i runga i ngā āhuetanga e whai ake nei:

Despite best efforts, Counsel are unable to file opening submissions before the set deadline. Accordingly, Counsel respectfully seek a brief extension to file opening submissions for the Claimants on the following bases:

- (a) Kua pāngia ngā rōia e ētahi tangihanga i roto i ēnei rangi tata nei, ā, kua whakataimaha i tā ēnei rōia āheinga ki te tutuki i ngā tohutohu; ka mutu

Counsel’s workload has been affected by several tangihanga in recent days which has impacted Counsel’s ability to meet the set

¹ Wai 2700, #2.6.17 Memorandum-Directions of Judge Reeves regarding filing milestones for Hearings Two and Three (4 March 2026) at [10].

deadline; and

- (b) Kua pokea hoki ngā rōia e ngā mahi whakapākehā i ngā tuhinga kua tukuna i ēnei rangi tata nei, inarā, te whakapakāhetanga o tā Heeni Te Mate Kōiwi taunakitanga, me ngā tāpaetanga.

Counsel have also been translating documents filed in recent days into English, including the Brief of Evidence of Heeni Te Mate Kōiwi, as well as that for opening submissions due.

4. Nō reira, me whai wā ēnei rōia ki te whakaoti i ngā mahi nei, ā, kia whiwhi hoki i ngā tohutohu a ngā Kaikerēme mō ēnei mahi.

Accordingly, further time is required to complete this work and to obtain instructions from the Claimants in respect of same.

5. I runga i ēnei āhuatanga, e kimi ana ēnei rōia, i runga anō i te whakaute, he wāhi whakaroatanga ki te tuku i ngā Kaikerēme tāpaetanga whakataka hei te Mane e tū mai nei, te **5 karaka, 9 o Māehe 2026**.

On these bases, Counsel respectfully seek an extension to file the Claimants' opening submissions by 5pm, Monday 9 March 2026.

6. E whakapāha atu nēi ēnei rōia i te āhua o tēnei tono. E tāpae ana ēnei rōia i runga i te whakaute, ki te whakaae te Kaiwhakawā ki tēnei tono, kāhore he tino whakahāweatanga ka pā ki tētahi atu.

Counsel sincerely apologise for the nature of this request. Counsel submit that should the request sought be granted, no significant prejudice will accrue to any other party.

I TĒNEI RĀ, i Pōkeno, i te rā 6 o Māehe 2026



Ihipera Peters / Aroha Herewini / Amber Evans

Ngā rōia mō ngā Kaikerēme