

BEFORE THE WAITANGI TRIBUNAL

**WAI 2700
WAI 381
WAI 2872
WAI 2494**

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Mana Wāhine Kaupapa Inquiry

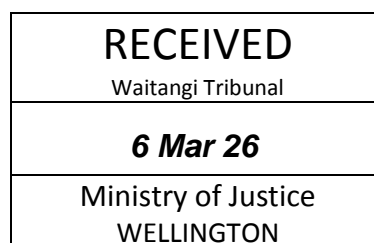
AND

IN THE MATTER OF of a claim filed by **DAME ARETA KOOPU** on behalf of herself and on behalf of the Maori Women's Welfare League Incorporated and by **DAME WHINA COOPER, DAME MIRA SZASZY, DR ERIHAPETI MURCHIE, GEORGINA KIRBY, VIOLET POU, JUNE MARIU, HINE POTAKA, AROHA RERITI-CROFTS** (being past Presidents of the Māori Women's Welfare League) and on behalf of themselves and **RĪPEKA EVANS** of Ngāpuhi, Te Aupouri, Ngāti Kahu and Ngāti Porou for herself and on behalf of Māori women and by **MARY-JANE PAPAARANGI REID** of Te Rarawa and Te Aupouri for herself and on behalf of Māori women and by **DONNA AWATERE-HUATA** of Ngāti Whakaue and Ngāti Porou for herself and on behalf of Māori women and by **LADY ROSE HENARE** for herself and on behalf of Ngāti Hine and by **KATERINA HOTERENE** for herself and on behalf of Ngāti Hine and by **TEPARA MABEL WAITITI** for herself and on behalf of Ngāti Hine and by **KARE COOPER-TATE** for herself and on behalf of Ngāti Hine (Wai 381)

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MEMORANDUM OF COUNSEL

Dated this 6th day of March 2026



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SYKES & Co.**
barristers & solicitors
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AND

IN THE MATTER OF

a claim by **Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuia Hata (Wai 2872)**

AND

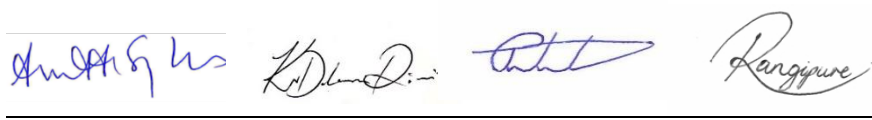
IN THE MATTER OF

Donna Awatere-Huata of Ngāti Porou, Ngāti Whakaue and Ngāti Hine, on behalf of herself and all Māori (**Wai 2494**)

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is on behalf of the following claimants:
 - a. **WAI 381** - the part of the claim represented by Sykes & Co and **WAI 2494**. Both claims are for and on behalf of Donna Awatere-Huata of Ngāti Whakaue and Ngāti Porou for herself and on behalf of Māori women; and
 - b. **WAI 2872** - a claim by Dr Leonie Pihama, Angeline Greensill, Mereana Pitman, Hilda Halkyard-Harawira and Te Ringahuaia Hata.
2. In Memorandum-Directions dated 4 March 2026, Her Honour Judge Reeves directed claimant counsel to file Hearing Weeks Two and Three opening submissions, together with one-page summaries, by 5.00 pm, Friday 6 March 2026.
3. Due to the claimants' involvement in a number of concurrent kaupapa requiring counsel's engagement and further instructions, counsel is regrettably unable to meet the above deadline. Accordingly, counsel respectfully seeks an extension of time to file these documents until 5.00 pm, Wednesday 11 March 2026.
4. Counsel sincerely regret the delay and apologise for any inconvenience this may cause to the Tribunal and other parties.

DATED at Rotorua this 6th day of March 2026



Annette Sykes	Kalei Delamere- Ririnui	Jack Potaka	Rangipurei Manley
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Counsel for Claimants