OFFICIAL

IN THE WAITANGI TRIBUNAL

Wai 2700
Wai 3011

IN THE MATTER OF	the Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	the Mana Wāhine Kaupapa Inquiry
BY	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

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MEMORANDUM OF COUNSEL
FILING OPENING SUBMISSIONS

Dated: 6 March 2026

RECEIVED
Waitangi Tribunal
9 Mar 26
Ministry of Justice
WELLINGTON

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Counsel Acting: Janet Mason & Lars Thompson

MAY IT PLEASE THE TRIBUNAL:

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

a. is filed on behalf of 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 ("the Claimants"); and

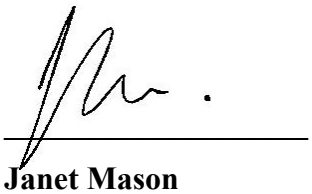
b. files opening submissions, dated 6 March 2026.

2. In Memorandum Directions dated 15 December 2025, Her Honour Judge Reeves directed for the filing opening submissions for Hearings Two and Three of the Rangatiratanga Pou to occur no later than Friday 12 February 2026. [1]

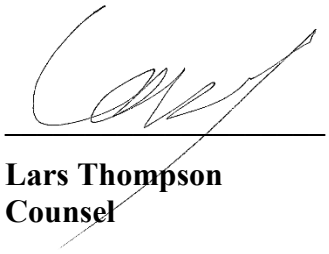
3. In an email of the Registrar dated 11 February 2026, a blanket extension was granted to 6 March 2026 for the filing of opening submissions.[2]

4. Counsel now files the opening submissions of the Claimants.

Dated 6 March 2026



Janet Mason
Counsel Acting



Lars Thompson
Counsel

[1] Wai 2700, #2.6.13(a).
[2] Email of the Registrar, dated 11 February 2026.