

IN THE WAITANGI TRIBUNAL

**WAI 3300
WAI 2797**

IN THE MATTER OF

The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

Tomokia ngā tatau o Matangireia:
the Constitutional Kaupapa Inquiry
(Wai 3300)

AND

IN THE MATTER OF

A claim by Te Rangikaiwhiria
Kemara on behalf of Ngaa Hapuu
Maha O Maniapoto (Wai 2797)

**MEMORANDUM OF COUNCIL FILING REPLY
TO CROWN STATEMENT OF POSITION
DATED 20 FEBRUARY 2026**

**Te Mata Law Ltd
Barristers and Solicitors**

PO Box 44331

Point Chevalier

AUCKLAND 1246

Tel: 0508-TEMATA (0508-836282)

Counsel Acting: David Stone | Charl Hirschfeld | Catherine Leauga | Harry
Clatworthy

David@tematalaw.co.nz | Charl@tematalaw.co.nz | Catherine@tematalaw.co.nz |

Harry@tematalaw.co.nz



RECEIVED

Waitangi Tribunal

20 Feb 26

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Te Rangikaiwhiria Kemara on behalf of himself and on behalf of the hapū of Wai 2797, Ngaati Maahuri, Ngaati Werawera (ki Marokopa), Ngaati Kahinga, Ngaati Tauhunu, Ngaati Kahumoana, Ngaati Tuwaikoea, the descendants of Puukauae, known collectively as Ngaa Hapuu Maha O Maniapoto (‘the Claimants’).
2. On 13 February 2026, the Presiding Officer, Chief Judge Fox, invited claimants to file a reply to the Crown’s statement of position, the deadline for this filing being 5pm, Friday 20 February 2026.
3. Accordingly, a statement of reply from the Claimants is filed alongside this memorandum.

Dated this 20th day of February 2026 at Tāmaki Makaurau



Charl Hirschfeld

Counsel for the claimant

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for Wai 3300 Tomokia ngā tatau o Matangireia: the Constitutional Kaupapa Inquiry.