

**IN THE WAITANGI TRIBUNAL
KEI MUA I TE TARAIPUUNARA**

**WAI 3300
WAI 1515**

UNDER

**The Treaty of Waitangi
Act 1975**

CONCERNING

**Tomokia Ngā Tatau ō
Matangireia – the
Constitutional Kaupapa
Inquiry**

AND

**A claim by Tarawau Kapa
and Raewyn Kapa for and
on behalf of Te Kapa
Whānau o Iritana Haami
Pia raua ko Piriwaata
Matiu Kapa**

**MEMORANDUM OF COUNSEL FILING STATEMENT OF RESPONSE
OF RAEWYN KAPA (WAI 1515)**

Dated: 20 February 2026

RECEIVED

Waitangi Tribunal

20 Feb 26

Ministry of Justice
WELLINGTON

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**KŌKIRI
CHAMBERS**

TĒNĀ, E TE RŌPŪ WHAKAMANA I TE TIRITI:

1. This memorandum of counsel is filed on behalf of Wai 1515 a claim by Tarawau Kapa and Raewyn Kapa for and on behalf of Te Kapa Whānau o Iritana Haami Pia raua ko Piriwaata Matiu Kapa.
2. By email dated 13 February 2026, the Waitangi Tribunal directed parties to file a response to the Crown statement of position, presented on 13 February 2026, by 20 February 2026.
3. The Statement of Response of Raewyn Kapa accompanies this memorandum.

Dated: 20 February 2026



Bryce Lyall
Counsel for Wai 1515



Hannah Swedlund