

IN THE WAITANGI TRIBUNAL
THE MANA WĀHINE KAUPAPA INQUIRY

WAI 2700
WAI 2257
WAI 1928

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the Mana Wāhine Kaupapa Inquiry (WAI 2700)

AND

a claim by Gloria Karaitiana on behalf of herself and her whānau (the Descendants of Te Hirawanu (Karaitiana) claim) (WAI 1928)

AND

a claim by the late Maruhaeremuri Stirling, Ruiha Stirling, the late Parehuia Herewini-Kahika and Haro Mclroy in association with the whānau, hapū and iwi of Te Whānau-a-Apanui and Whakatohea (Te Whānau Apanui Mana Wāhine (Stirling) claim) (WAI 2257)

**MEMORANDUM OF COUNSEL FILING THE BRIEF OF EVIDENCE AND
OPENING SUBMISSION OF WHAEA RUIHA STIRLING AND ADDRESSING OTHER MATTERS**

Dated 10 April 2026

RECEIVED

Waitangi Tribunal

10 April 26

Ministry of Justice
WELLINGTON

COUNSEL ACTING

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TE ĀRAHI LAW
LEGAL SPECIALISTS

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following Claimants:
 - (a) Te Whanau Apanui Mana Wāhine (Stirling) claim (**Wai 2257**); and
 - (b) The Descendants of Te Hirawanu (Karaitiana) claim (**Wai 1928**).

2. We refer to the Memorandum-Directions dated 27 March 2026 (Wai 2700, #2.6.19), which set out an updated filing timetable requiring parties to file their remaining briefs of evidence and opening submissions, to be heard on the papers, for Hearings Two and Three by **5pm, Friday 10 April 2026**.¹

WAI 2257

3. Counsel **attaches** the **brief of evidence** and **opening submission** of **Whaea Ruiha Stirling** on behalf of the Wai 2257 claim.

WAI 1928

4. Counsel has recently received instructions from our Wai 1928 Claimant. We had previously indicated that our Claimant would file her brief of evidence and opening submission under the Rangatiratanga Pou by 5pm, today.² However, following her instructions and after reviewing the content of her evidence, we now confirm that it is more appropriately filed under the **Whakapapa me Whānau Pou**. Counsel will file her evidence on the deadline set for that Pou, once it becomes available.

DATED this 10th day of April 2026



Chris Beaumont
Counsel for the Claimants



Tekih Veikoso
Counsel for the Claimants

¹ Wai 2700, #2.6.19(c).

² Wai 2700, #3.2.109 at [7].