

**IN THE WAITANGI TRIBUNAL  
KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI**

**WAI 745 / 1308**

**WAI 2700**

**UNDER** the Treaty of Waitangi Act 1975

**IN THE MATTER OF** The Mana Wāhine Kaupapa Inquiry  
**AND**

**IN THE MATTER OF** a claim by **Luana Pirihi** and **Paki Pirihi** (deceased) on behalf of Patuharakeke (Wai 745) and a claim filed by **Ngawaka Pirihi**, **Paraire Pirihi** (deceased), **Harry Midwood**, **Patricia Heperi**, **Crete Milner** and **Terence Pirihi** on behalf of the owners of Pukekauri 1B1, 1B2, 1B3, 1B4, and 1B5, and Takahiwai 4C, 4D1, 4E, 7A, 7B2, and 7C (Wai 1308)

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**OPENING SUBMISSIONS ON BEHALF OF THE WAI 745/1308 CLAIMANTS**

10 April 2026

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**This document is filed by:-**



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**RECEIVED**

Waitangi Tribunal

**13 April 26**

Ministry of Justice  
WELLINGTON

## TĒNĀ E TE TARAIPIUNARA

1. This Memorandum of Counsel is filed on behalf of
  - a. Luana Pirihi and the late Paki Pirihi, on behalf of the Patuharakeke Te Iwi Trust Board and Patuharakeke hapū (Wai 745); and
  - b. Ngawaka Pirihi, Paraire Pirihi (deceased), Harry Midwood, Patricia Heperi, Crete Milner and Terence Pirihi on behalf of the owners of Pukekauri and Takahiwai blocks (Wai 1308),collectively referred to as **the Claimants**.
2. On 15 December 2025, Her Honour Judge Reeves issued a Memorandum of Directions, requiring Counsel to file Opening Submissions and claimant evidence (to be heard on the papers) relating to Hearing Weeks Two and Three of this Inquiry by 5pm, Friday 10 April 2026.<sup>1</sup>
3. Accompanying this memorandum for filing is the evidence of:
  - a. Lisa Minhinnick; and
  - b. Faye Deborah Harding.
4. Regretfully, Counsel was only able to obtain instructions regarding the finalisation of the aforementioned evidence late this afternoon. As such, we have been unable to finalise the Opening Submissions prior to today's filing deadline.
5. Counsel seeks leave to file the Opening Submissions late, and requests a short extension to 5pm, Monday 13 April. As the Claimants' submissions and evidence are being heard on the papers in this Pou, we do not anticipate any prejudice to other parties should this extension be granted.

**DATED** at Auckland this 10<sup>th</sup> day of April 2026



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**Kelly Dixon / Taamorangi Hartley / Grace Taylor**

Counsel for the Wai 745/1308 Claimants

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<sup>1</sup> Wai 2700, #2.6.013