

**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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**MEMORANDUM OF COUNSEL FILING OPENING SUBMISSIONS AND  
REFILING EVIDENCE**

13 April 2026

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**This document is filed by:-**



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**RECEIVED**

Waitangi Tribunal

**13 Apr 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 Takahiawai 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 Friday 10 April 2026.<sup>1</sup>
3. Counsel filed the evidence of Lisa Minhinnick and Faye Deborah Harding on Friday 10<sup>th</sup> April in accordance with this filing deadline. Additional to this filing, Counsel sought a short extension to file the Opening Submissions for the Claimants today, Monday 13<sup>th</sup> April, pursuant to late instructions received from the Claimants.
4. Accordingly, this Memorandum of Counsel accompanies the Opening Submissions for the Claimants.
5. Counsel received instructions from the Claimants following the filing of the evidence of Faye Deborah Harding, early on Monday 13<sup>th</sup> April. These instructions were to make a minor amendment to paragraph [2].
6. We respectfully seek leave to refile the evidence of Faye Deborah Harding and replace the previously filed document with this updated version.

**DATED** at Auckland this 13<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