I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 2700
WAI 3003

KEI RARO I TE MANA O	te ture o te Tiriti o Waitangi 1975
I TE TAKE O	te pakirehua Wai 2700 mō ngā kerēme e pā ana ki te Mana o te Wahine
Ā	
I TE TAKE O	tētahi kerēme nā Nora Rameka, rātou ko Rukuwai Allen ko Heeni Brown (Wai 3003)

He Manatu Rōia e tuku ana i ngā whakautu ki tā te Taraipiunara pātai
Memorandum of Counsel filing responses to Tribunal questions
I tēnei rā, i te 5 o Akuhata 2026

RECEIVED
Waitangi Tribunal
5 Aug 26
Ministry of Justice
WELLINGTON

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TĒNĀ, E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

1. Kua whakakōnaetia tēnei manatu rōia mā te kerēme Wai 3003, he kerēme nā Nora Rameka rātou ko Rukuwai Allen ko Heeni Brown (*"ngā Kaikerēme"*).

   This Memorandum of Counsel is filed on behalf of the Wai 3003 claim, a claim by Nora Rameka, Rukuwai Allen and Heeni Brown ("the Claimants").

2. Nō te rā 22 o Mei 2026 tohutohu ai a Kaiwhakawā Reeves kia tuku ngā rōia i ngā whakautu ki ngā pātai ā-tuhi e pā ana ki ngā kōrero taunaki i tukuna i ngā nohoaga tuarua me tuatoru hei te 5 karaka, te 23 o Hūrae 2026.[1]

   By way of Memorandum-Directions of her Honour Judge Reeves dated 22 May 2026, Counsel were directed to file witness responses to questions in writing regarding evidence presented at hearings two and three by 5pm, 23 July 2026.

3. I te 23 o Hūrae 2026 i tonoa e māua kia whakaroahia te wā tuku i ngā whakautu a ngā Kaikerēme hei te Tūrei, hei te 5 karaka, 28 o Hūrae 2026. I whakaae mai te Kaiwhakawā ki tēnei tono mā te Kairēhita i te 24 o Hūrae 2026.

   On 23 July 2026, Counsel sought an extension to file witness responses by 5pm, 28 July 2026. The extension request was granted by Her Honour by way of email from the Registrar on 24 July 2026.

4. I te 28 o Hūrae 2026 i tonoa e māua kia whakaroahia te wā tuku i ngā whakautu a ngā Kaikerēme hei te Tūrei, hei te 12 karaka, 31 o Hūrae 2026. I whakaae mai te Kaiwhakawā ki tēnei tono mā te Kairēhita i te 28 o Hūrae 2026.

[1] Wai 2700, #2.6.24 *Memorandum-directions of Judge Reeves following hearings two and three* (22 May 2026) at [6(c)].

On 28 July 2026, Counsel sought an extension to file witness responses by 12pm, 31 July 2026. *The extension request was granted by Her Honour by way of email from the Registrar on 28 July 2026.*

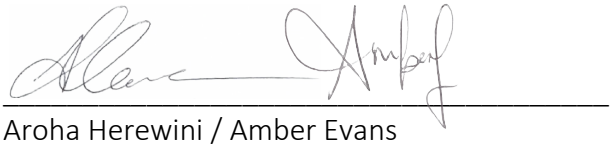
5. Nō reira, e kōnae ana me te manatu rōia nei te whakautu o ngā kaikōrero mō te kerēme Wai 3003 ki te pātai ā-tuhi ā te Taraipiunara.

Accordingly, Counsel file with this memorandum the response of the witnesses for the Wai 3003 claim to the written question of the Tribunal.

6. E whakapāha atu nei ēnei rōia i te āhua tōmuri o tēnei tuku. E tāpae ana ēnei rōia i runga i te whakaute, ki te whakaae te Kaiwhakawā ki tēnei tuku. Mēnā ka whakaae mai te Kaiwhakawā ki te tuku nei, kāhore he tino whakahāweatanga ka pā ki tētahi atu.

Counsel sincerely apologise for the delay in filing. Counsel respectfully seek leave for the documents filed to be added to the record of inquiry. Should this request be granted, Counsel submit that no significant prejudice will accrue to any other party.

I TĒNEI RĀ, i Tāmaki Makaurau, i te rā 5 o Ākuhata 2026



Aroha Herewini / Amber Evans
Ngā rōia mō ngā Kaikerēme