IN THE WAITANGI TRIBUNAL	**WAI 3300** **WAI 1823** **WAI TBC**
UNDER	The Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	the Constitutional Kaupapa Inquiry (Wai 3300)
AND	
IN THE MATTER OF	A claim by Michaela Rangitaawa-Schofield for Wai 1823 and Wai TBC.

MEMORANDUM OF COUNSEL

DATED 4 SEPTEMBER 2026

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Barristers and Solicitors
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RECEIVED
Waitangi Tribunal
4 Sep 26
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Michaela Rangitaawa-Schofield ("the claimant"). The claimant has previously sought for the Wai 1823 statement of claim to participate in the Wai 3300 Inquiry and made submissions on eligibility[1].

2. In accordance with Memorandum Directions dated 7 August 2026[2], please find attached for filing, a new statement of claim on behalf of the claimant. As the directions specifically requested a new statement of claim and not an amended statement of claim, counsel have accordingly complied and request a new Wai number be appointed to the new statement of claim.

3. The new statement of claim removes any reference to historical matters which were previously settled under the Wai 1823 claim and outlines the claimants new and contemporary grievances and breaches of Te Tiriti which are relevant to the Wai 3300 Inquiry.

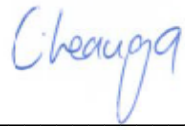
4. Counsel submit the new statement of claim is eligible to participate in the Wai 3300 Inquiry as the contemporary issues do not form part of the Wai 1823 claim which is included in the Maniapoto settlement.

5. Counsel seek leave for the new statement of claim to be added to the Wai 3300 record of inquiry, and for a direction to be made confirming a new Wai number; and that the claim is eligible, and can participate as a full party in the Wai 3300 Inquiry. Such a direction will be helpful for attaining legal aid as soon as possible.

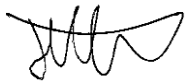
[1] Wai 1823 #3.2.443
[2] Wai 3300 #2.6.90

DATED at Auckland this 4th day of September 2026.

David Stone



Catherine Leauga



Harry Clatworty

Counsel for the claimant

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for the Wai 3300 Constitutional Kaupapa Inquiry.