
KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA
I TE TIRITI O WAITANGI

BEFORE THE WAITANGI TRIBUNAL

WAI 2700

KEI RARO I TE MANA te ture o Tiriti o Waitangi

AND

I TE TAKE O te pakeirehua Mana Wāhine

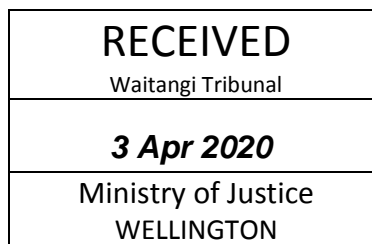
IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Mana Wāhine Kaupapa Inquiry

CROWN MEMORANDUM SEEKING AN EXTENSION

3 April 2020



CROWN LAW

TE TARI TURE O TE KARAUNA

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**E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI:
MAY IT PLEASE THE TRIBUNAL:**

1. In memorandum-directions dated 17 February 2020 the Presiding Officer directed Crown counsel to file submissions to inform discussion at the judicial conference by 1 April 2020.¹ A subsequent extension was granted to file by 3 April 2020.²
2. Claimant counsel have sought further extension requests:
 - 2.1 Janet Mason and Rianni Soriano on behalf of a number of claimants seeking an extension until 27 March 2020. The Crown is yet to receive this submission;³
 - 2.2 Darrel Naden, Stephanie Roughton and Siao Si Loa on behalf of a number of claimants filed a memorandum seeking a further extension to file three subsequent working days after Janet Mason and Rianni Soriano have filed their submission.⁴
3. In addition, a number of Crown officials responsible for providing instructions relating to the Inquiry have been diverted to focus on the Covid-19 response.
4. On 25 March 2020, the Chairperson issued the Waitangi Tribunal COVID-19 Level 4 protocol, which provides that all events of the Tribunal will be adjourned and will be rescheduled once New Zealand has ceased to be at Level 4. The Crown has sought clarification from the Registrar as to whether “events” in the protocol includes filing dates. The Crown is yet to receive a response.
5. If the Inquiry is not adjourned under the Waitangi Tribunal COVID-19 Level 4 protocol, the Crown seeks an extension of time to file its submissions by Friday 24 April 2020.

¹ Memorandum-directions of the Presiding Officer convening the judicial conference dated 17 February 2020 (Wai 2700, #2.5.13).

² Memorandum-directions of the Presiding Officer granting extensions sought dated 27 March 2020 (Wai 2700, #2.5.14).

³ Wai 2700, #3.1.198

⁴ Memorandum of Counsel dated 1 April 2020.

6. The Crown understands that the claimant counsel listed in [2] have substantial submissions to make on the issues of overlap between Wai 2915, the Oranga Tamariki Urgent Inquiry, and this Inquiry and other matters in relation to this Inquiry. The Crown would like to consider those submissions and respond in full. However, the Crown is also aware that majority of claimants have filed submissions and would like to respond to those submissions in a timely manner. If necessary, the Crown may need to file supplementary submissions responding to the submissions of claimant counsel listed in [2].

3 April 2020



Matewai Tukapua / Sarah Gwynn
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal
AND TO: Claimant Counsel