

IN THE WAITANGI TRIBUNAL

Wai 2700

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Mana Wahine Kaupapa Inquiry

**MEMORANDUM OF COUNSEL SEEKING A FURTHER
EXTENSION**

5 April 2020

RECEIVED Waitangi Tribunal
6 Apr 2020
Ministry of Justice WELLINGTON

Phoenix Law

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Counsel Acting: Janet Mason

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel (“MoC”):
 - a. is filed on behalf of the Claimants and interested parties set out in **Annex A** (together called “the Claimants”); and
 - b. respectfully seeks a further extension for the filing of submissions in relation to the adjourned Judicial Conference (“the JC Subs”) which was to have been held on the 15th of April 2020 (“the 15 Apr JC”), as directed by Her Honour, Judge Reeves, in Memorandum-Directions (“MDs”) dated the 17th of February 2020 (“the 17 Feb MDs”).¹
2. On the 20th of March 2020, Counsel filed an MoC seeking an extension until the 27th of March 2020 to file the JC Subs.² In MDs dated the 27th of March 2020 (“the 27 Mar MDs”), Her Honour granted the extension sought.³
3. The JC Subs have yet to be finalised due to the impacts of a recent restructure at the Firm, coupled with COVID-19 impacts on the Firm’s work. In particular, because the Firm also has an office in Fiji, and Counsel resides partly in Fiji and partly in Aotearoa New Zealand, working through the impacts of COVID-19 has had a significant effect on our workloads.
4. Counsel therefore now respectfully seeks a further extension until the end of Tuesday, the 14th of April 2020.
5. Counsel notes the MoC filed by the Crown dated the 3rd of April 2020, in which the Crown seeks an extension until the 24th of April to file its submissions responding to the JC Subs. It is submitted that should the Crown request be

¹ Wai 2700, #2.5.13.

² Wai 2700, #3.1.198.

³ Wai 2700, #2.5.16 at paragraph 9.

granted, the Crown would have sufficient time within which to respond to the Claimant's submissions, if the request contained herein was granted.

6. Counsel respectfully submits that no prejudice will accrue to any party as a result of the extension being granted.

Dated 5th April 2020



Janet Mason

Counsel Acting