

**IN THE WAITANGI TRIBUNAL
KE MUA I TE TARAIPUNARA**

WAI 3300

WAI 3059

UNDER The Treaty of Waitangi Act 1975
AND
IN THE MATTER OF The Constitutional Kaupapa Inquiry
AND
IN THE MATTER OF A claim by Kelly Klink on behalf of
herself and the iwi Ngāti
Rehua/Ngātiwai ki Aotea

MEMORANDUM OF COUNSEL

Dated: 27 November 2024

Counsel acting: Linda Thornton
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Waitangi Tribunal


27 Nov 24

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed on behalf of Wai 3059, a claim by Kelly Klink on behalf of herself and her hapū, Ngāti Rehua/Ngātiwai ki Aotea (“Ngāti Rehua”).
2. Claimant has indicated her interest in participating in the Wānanga a Rohe phase of this inquiry on 17 October 2024 [#3.2.110] and specifically, her interest in participating at this first wānanga hui on 22 October 2024 [#3.2.106].
3. Claimant has been included in the proposed timetable [#32.150(b)] to speak in the time slot set beginning around 11 am on 2 December 2024.
4. Tribunal directions #2.6.035[14] has provided clarification that aided in the preparation of her statement of position.
5. Accordingly, we now file the claimant’s statement of position and seek leave for it to be included in the Record of Inquiry and included in the wānanga session on 2 December 2024.

Dated: 27 November 2024



Linda Thornton, Counsel for
Kelly Klink, Wai 3059