
KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I WAI 3513
TE TIRITI O WAITANGI WAI 3352
BEFORE THE WAITANGI TRIBUNAL

IN THE MATTER OF The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF The Citizenship (Ruddock) Urgent Inquiry (Wai 3513)

AND

IN THE MATTER OF The New Zealand Māori Council Constitutional Claim (Wai 3352)

MEMORANDUM OF COUNSEL REGARDING CLOSING SUBMISSIONS

6 October 2025

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RECEIVED

Waitangi Tribunal

6 Oct 25

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed for and on behalf of Wai 3352 – a claim by Anne Kendall, Sir Taihākurei Durie, Kereama Pene, Dr Kenneth Kennedy and Sharon Gemmel on behalf of the New Zealand Māori Council (“**NZMC**”).
2. On 4 September 2025, counsel for the claimants filed a memorandum of counsel seeking to be included in the Citizenship (Ruddock) Urgent inquiry (Wai 3513) as an interested party.
3. On 8 September 2025, by way of correspondence via the Registrar, the Presiding Officer granted this request and directed counsel to file submissions by 12 September 2025.
4. By way of memorandum of directions dated 15 September 2025, NZMC’s participation in the Inquiry was confirmed by Judge Thomas.¹
5. Following the hearing that took place on 16-17 September 2025, Judge Thomas directed closing submissions were to be filed by all parties by Friday 10 October 2025.²
6. The submissions filed by counsel on behalf of NZMC claimants on 12 September 2025, are held on the Record of Inquiry as Wai 3513, #3.3.2 “Opening submissions of the New Zealand Māori Council”.
7. They are accompanied by:
 - 7.1. A synopsis of Argument (Wai 3513, #3.3.3);
 - 7.2. List of Authorities (Wai 3513, #3.3.(a));

¹ Wai 3513, #2.5.8 at [7]; Wai 3513, #2.5.8(b).

² Wai 3513, #2.7.1 at [13].

7.3. Bundle of Relevant Documents (Wai 3513, #A13)

8. To clarify, the submissions referenced in the above paragraph are the only submissions counsel intends to file.
9. Claimant counsel will not be filing closing submissions and asks the Tribunal to consider the submissions filed on 12 September 2025, Wai 3513, #3.3.2, as the substantive submission on behalf of the NZMC claimants.

Dated at **Wellington** this Monday, 6 October 2025.



Donna Hall

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