

**I TE RŌPŪ WHAKAMANA
I TE TIRITI**

WAI 3513

KEI RARO I TE MANA o te ture o te Tiriti o Waitangi 1975

I TE TAKE O te ruku tātari ohotata, the Citizen (Ruddock)
Urgent Claim (Wai 3513)

JOINT MEMORANDUM OF COUNSEL

I tēnei rā, i te 7 o Kōpū 2025



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Ngā rōia

**Dr Season-Mary Downs
Chelsea Terei-Tipene
Tatijana-Simon Larsen**

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Waitangi Tribunal

7 Oct 25

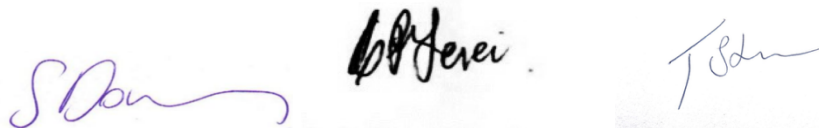
Ministry of Justice
WELLINGTON

KIA WHAKAAE MAI TE RŌPŪ WHAKAMANA I TE TIRITI:

INTRODUCTION

1. This Joint Memorandum of Counsel is filed on behalf of Tukau Law, Manaia Legal and Crown Law.
2. As per her Honour Judge Thomas' Memorandum-Directions dated 22 September 2025, all parties have been directed to file written closing submissions by Friday 10 October 2025.¹
3. Counsel have liaised in respect of the filing of closing submissions and due to heavy workloads are agreeable that an additional two working days is required for completion.
4. We therefore respectfully request an extension for all parties to 5pm on Tuesday 14 October 2025.

I TĒNEI RĀ, te rā 7 o Kōpū 2025



Dr Season-Mary Downs/Chelsea Terei-Tipene/Tatijana Simon-Larsen
Ngā rōia mō ngā kaikerēme

¹ Wai 3513, #2.7.1, Memorandum-directions of the Presiding Officer following the urgent hearing into the Citizenship (Ruddock) Urgent claim [22 September 2025] at [13].