

**IN THE WAITANGI TRIBUNAL
KEI MUA I TE TARAIPUUNARA**

WAI 3300

WAI 421

WAI 593

WAI 869

WAI 1383

WAI 1890

UNDER

**The Treaty of Waitangi Act
1975**

CONCERNING

**Te Pakirehua o te Tomokia
Ngā Tatau o Matangireia –
the Constitutional Kaupapa
Inquiry**

AND

**Claims brought by Te
Waimate Taiamai ki Kaikohe
Claims Alliance**

MEMORANDUM OF COUNSEL

Dated: 10 December 2025

Counsel:
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Waitangi Tribunal

11 Dec 25

Ministry of Justice
WELLINGTON

KIA WHAKAAE MAI TE TARAIPUNARA

1. This memorandum is filed for Wai 421, 593, 869, 1383 and 1890: the combined claims of Te Waimate Taiamai ki Kaikohe Alliance.
2. Kay Martin spoke to the Alliance's statement of position at the wānanga on 4 December 2025.
3. As directed, we have attached her speaking notes. These are to sit alongside the statement of position, not to replace it.

Dated: 10 December 2025

A handwritten signature in black ink, appearing to be 'B Lyall', written in a cursive style.

Bryce Lyall
Counsel