

**IN THE WAITANGI TRIBUNAL**

**Wai 3060**

**IN THE MATTER OF** the Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF** Te Rau o te Tika: the Justice System  
Inquiry

**BY** Amy Emily Bethune, on behalf of  
herself, her Tamariki, and her  
whānau

and others...

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**MEMORANDUM OF COUNSEL SEEKING EXTENSION**

**Dated: 8 October 2025**

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**Phoenix Law Limited**

Barristers and Solicitors

200 Willis Street

PO Box 27400

Marion Square

Wellington 6141

**Phone:** (04) 384 1353

**Email:** mason@phoenixlaw.expert

**and:** sabori@phoenixlaw.expert

**Counsel Acting:** Janet Mason

**Counsel Assisting:** Hussain Sabori

**RECEIVED**

Waitangi Tribunal

**8 Oct 25**

Ministry of Justice  
WELLINGTON

**MAY IT PLEASE THE TRIBUNAL:**


1. This Memorandum of Counsel is filed on behalf of:
  - a. the Claimants described in **Annex A** (“Claimants”); and
  - b. respectfully seeks an extension.
  
2. In Memorandum-Directions dated 25 September 2025 (“the 25 September MDs”), Her Honour Judge Wainwright directed Counsel to provide the following details no later than 5 pm, Wednesday 8 October 2025.<sup>1</sup>
  - a. kaikōrero yet to be heard in He Rau Kōrero ā-Tara Whare with accompanying detail;
  - b. kaikōrero in custody with accompanying detail;
  - c. any Crown plans to include site visits in its evidence for Te Aronui o Te Tāhī, with information about what and where;
  - d. which sites, programs, processes and Courts should be prioritised for panel visits; and
  - e. Crown feedback on any difficulties that might arise concerning potential visits listed in Appendix B.<sup>2</sup>
  
3. Counsel acts for a large number of Claimants who are currently domiciled in prison. As it generally takes a week or two to arrange AVL meetings with each of our prison clients, we have been unable to brief each of them nor, to finalise instructions within the timeframe provided. Counsel therefore respectfully requests an extension to 5 pm, on Wednesday 22 October, to respond to the 25 September MDs.

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<sup>1</sup> Wai 3060, #2.6.48 at [19].

<sup>2</sup> Wai 3060, #2.6.48 at [20(a)-(e)].

4. Counsel apologises for the delay, and respectfully submits that no prejudice will accrue to other parties should the extension sought be granted.



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**Janet Mason**  
**Counsel Acting**