

**IN THE WAITANGI TRIBUNAL****WAI 3300  
WAI 3389**

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

**IN THE MATTER  
AND** of the te Tomokia Ngā Tatau o Matangireia – the Constitutional Kaupapa Inquiry (Wai 3300)

**IN THE MATTER** of a claim by Nicki Wakefield, Bonnie Jade Kake, Kiri Edwards, Hūhana Lyndon, Mark Ngahoia Scott and Brandon Edwards on behalf of themselves and diverse hapū across Tai Tokerau (Wai 3389)

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**MEMORANDUM OF COUNSEL FILING STATEMENT OF POSITION**Dated 19 December 2025

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<b>RECEIVED</b> Waitangi Tribunal
<b>19 Dec 25</b>
Ministry of Justice WELLINGTON

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**BENNION  
LAW**Barristers and Solicitors  
Level 1, 1 Ghuznee Street, Te Aro, Wellington 6011  
PO Box 25433Counsel: Tom Bennion / Emma Whiley / Kudrat  
tom@bennion.co.nz / emma@bennion.co.nz / kudrat@bennion.co.nz

## **E TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI**

1. This memorandum of counsel is filed on behalf Wai 3389, a claim by Nicki Wakefield, Bonnie Jade Kake, Kiri Edwards, Hūhana Lyndon, Mark Ngahoia Scott and Brandon Edwards on behalf of themselves and diverse hapū across Tai Tokerau.
2. The Matakīrea claimants presented at Te Wānanga Tuaono at Te Tii Marae. Attached to this memorandum are the claimants' speaking notes.

**Dated at Wellington this 19<sup>th</sup> day of December 2025**



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**Tom Bennion / Emma Whiley / Kudrat**  
Counsel for Wai 3389