I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI **Wai 3300**
IN THE WAITANGI TRIBUNAL **Wai 2424**

In the Matter	of the Treaty of Waitangi Act 1975
And	
In the Matter	of the Tomokia ngā tatau o Matangireia – the Constitutional Kaupapa Inquiry (Wai 3300)
And	
In the Matter	of a claim by Maiki Marks, on behalf of herself, Harry Mahanga and Kitty Mahanga-Nisbet (Wai 2424)

Memorandum of Counsel regarding outstanding material

Dated 4 March 2026

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Waitangi Tribunal
4 Mar 26
Ministry of Justice
WELLINGTON

TĒNĀ E TE TARAIPIUNARA
MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of Wai 2424, a claim by Maiki Marks, on behalf of herself, Harry Mahanga and Kitty Mahanga-Nisbet.

2. In Memorandum-Directions dated 24 February 2026, her Honour Chief Judge Fox directed counsel to file electronic versions of the PowerPoint presentation and speaking notes used by Ms Marks at te Wānanga Tuaono by no later than 5:00 pm, 25 February 2026.[1]

3. Counsel advised in a memorandum filed on 25 February 2026 that this material could not be located in the time available. Counsel sought an extension until 4 March 2026 to file these documents or provide a further update on their filing. This extension was granted via email from the Assistant Registrar on 27 February 2026.

4. Unfortunately, and despite multiple attempts, counsel have still not been able to contact Ms Marks and are therefore still not in a position to file the documents required by the Tribunal.

5. Counsel will continue to endeavour to obtain these documents and file them at the earliest opportunity. In the interim, counsel can provide updates on progress if that would be helpful to the Tribunal.

Dated at Te Whanganui-a-Tara this 4th day of March 2026

R M A Soriano and R K Gayfer
Counsel for Wai 2424

[1] Wai 3300, #2.6.82 at [27].