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 seeking extension

Dated 25 February 2026

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Waitangi Tribunal
25 Feb 26
Ministry of Justice
WELLINGTON

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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 have again attempted to obtain an electronic copy of this material since the publication of her Honour's directions. Unfortunately, however, this has not been possible in the short time available. Counsel are advised that the relevant files lie with the person who was supporting Ms Marks at the wānanga, who has not yet been able to be contacted.

4. In the circumstances, counsel seek a one-week extension to Wednesday, 4 March 2026 to file this material or provide a further update on when it can be filed.

5. Counsel acknowledge that the Tribunal is working to a tight deadline of 13 March 2026 to publish its draft wānanga ā-rohe report.[2] If the extension is not granted or if the material cannot be filed in time for consideration in the draft report, counsel note that the crux of Ms Marks' kōrero can be understood from her statement of position[3] and the transcript of her oral presentation.[4]

Dated at Te Whanganui-a-Tara this 25th day of February 2026

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

[1] Wai 3300, #2.6.82 at [27].
[2] Wai 3300, #2.6.82 at [17].
[3] Wai 3300, #B59.
[4] Wai 3300, #4.1.13 at 477–479.