

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL

Wai 3300
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 filing outstanding material

Dated 7 April 2026

RECEIVED

Waitangi Tribunal

7 Apr 26

Ministry of Justice
WELLINGTON

Mahony Horner Lawyers

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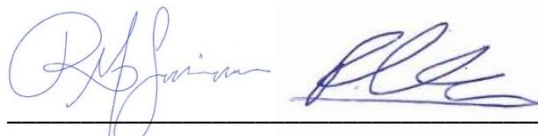
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TĒNĀ E TE TARAIPUNARA
MAY IT PLEASE THE TRIBUNAL

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 accordingly file with this memorandum an electronic copy of Ms Marks' PowerPoint presentation and speaking notes, with apologies to the Tribunal for the delay in providing these.

Dated at Te Whanganui-a-Tara this 7th day of April 2026



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

¹ Wai 3300, #2.6.82 at [27].