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BEFORE THE WAITANGI TRIBUNAL

WAI 2490

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IN THE MATTER OF                      The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF                      The Ngāpuhi Mandate Inquiry

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CROWN MEMORANDUM FILING CLOSING SUBMISSIONS

13 April 2015

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**CROWN LAW**  
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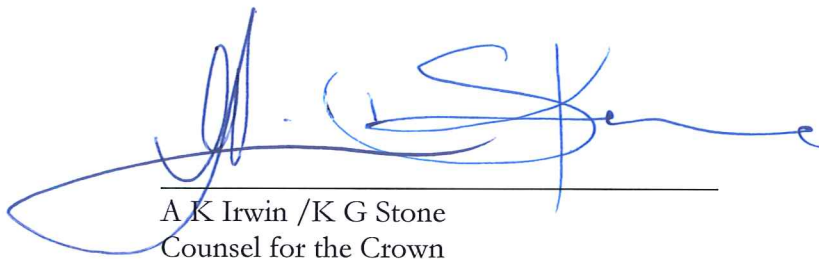
Contact Persons:  
David Soper and Kate Stone

**Barristers instructed:**  
Colin Carruthers QC  
Andrew Irwin

**MAY IT PLEASE THE TRIBUNAL:**

1. **Attached** for filing are the closing submissions of the Crown.
2. Because these submissions are filed after 5 pm, accordingly the Crown seeks leave to file these submissions out of time.

13 April 2015



A K Irwin /K G Stone  
Counsel for the Crown

**TO:** The Registrar, Waitangi Tribunal

**AND TO:** Claimant Counsel