

In the matter The Declaratory Judgments Act 1908

Between **Kiwi Party of New Zealand**
Applicant

And **ATTORNEY-GENERAL**
Respondent

Memorandum in regard to length of synopsis
Dated 14 December 2019

Presented for filing by:

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May it Please the Court

- 1 The rules provide that a synopsis may be no larger than 25 pages.
- 2 This appeal addresses the constitutional basis of the legal system in NZ.
- 3 This is an area of law which has been largely unquestioned, with the consequence
that most judges could benefit from a detailed exposition of the issues on appeal.
- 4 For example the *Delhi Laws* case, on which the abrogation pleading in the eight
cause of action relies, runs to 148 pages. Such a Judgment indicates the importance
the Supreme Court of India placed upon this issue, which is only 1 of 12 set out in
this pleading.
- 5 The Court of Appeal is an overburdened court and it is anticipated that this request
will not be received kindly, however the Court is respectfully reminded of the error
of predetermination, for which it was castigated by the Privy Council in *R v Taito*
[2002] NZPC 4; [2002] UKPC 15; [2003] 3 NZLR 577; (2002) 19 CRNZ 224; (2002) 6 HRNZ 539.
- 6 Counsel seeks to be able to file a synopsis of 64 pages or that length beyond 25 pages
as deemed appropriate.

Dated 14 December 2019



G E Minchin
Counsel for applicant