

**IN THE SUPREME COURT OF NEW ZEALAND  
I TE KOTI MANA NUI**

**SC 7/2022**

**BETWEEN                      FIONA MARGARET MEAD**

**Appellant**

**AND                              LILACH PAUL**

**First Respondent**

**AND                              BRETT PAUL**

**Second Respondent**

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**MEMORANDUM OF COUNSEL FOR THE SECOND RESPONDENT IN RELATION TO AN  
APPEAL TO THE SUPREME COURT  
Dated this 19th day of May 2022**

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**PRESENTED FOR FILING BY:**

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**MAY IT PLEASE THE COURT:**

1. Counsel acts for the Second Respondent in this matter.
2. Counsel has considered the lengthy submissions filed by Ms Taefi, Counsel for the First Respondent in this matter addressing the issues raised by this Appeal and has discussed these with the Second Respondent. Both the Second Respondent and his Counsel concur with their contents.
3. There is nothing further that Counsel for the Second Respondent seeks to add to the arguments that have been raised in her amended submissions dated 17 May 2022.
4. We agree that the Appeal should be dismissed.
5. We further agree that the contents of this Memorandum confirming agreement with the submissions is suitable for publication.

DATED 19 May 2022

James R Duckworth  
Counsel for the Second Respondent