

**IN THE WAITANGI TRIBUNAL**

**WAI 2700**

**IN THE MATTER OF**

the Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF**

the Mana Wāhine Kaupapa Inquiry

**AND**

**IN THE MATTER OF**

a claim by **Te Atawhai Nayda Te Rangi, Jane Stevens, Gini Sheppard, Charmaine Anaru, Dellamichelle Tahau, Tasi Huirama** and **Amelia Taniwha** on behalf of all Māori women and their whānau in gang environments

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**MEMORANDUM OF COUNSEL**  
**Dated this 21<sup>st</sup> day of December 2018**

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**Annette Sykes & Co.**  
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**MAY IT PLEASE THE TRIBUNAL**

1. This Memorandum of Counsel and accompanying Statement of Claim is filed on behalf of Te Atawhai Nayda Te Rangi, Jane Stevens, Gini Sheppard, Charmaine Anaru, Dellamichelle Tahau, Tasi Huirama and Amelia Taniwha on behalf of all Māori women and their whānau in gang environments (“the claimants”).
2. In the Memorandum-Directions of 4 September 2018<sup>1</sup>, an extension was granted to parties to file any new or amended statements of claim for inclusion in the Wai 2700 Mana Wāhine Kaupapa Inquiry by 12pm, 21 September 2018.
3. Counsel has only recently received instructions from the claimants to participate in this Inquiry and respectfully seeks leave for the statement of claim to be included on the record of inquiry.
4. This claim is eligible to participate in this Inquiry as it is a historical claim and has not yet been heard in any previous Inquiry.
5. Counsel submit that no other parties will be prejudiced by the inclusion of the amended statement of claim as the next stage of this Inquiry is still pending.

**DATED** at Rotorua this 21<sup>st</sup> day of December 2018



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Annette Sykes



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Rebekah Jordan



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Jordan Bartlett

Counsel for Claimants

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<sup>1</sup> Wai 2700, #2.5.7.

