

BEFORE 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

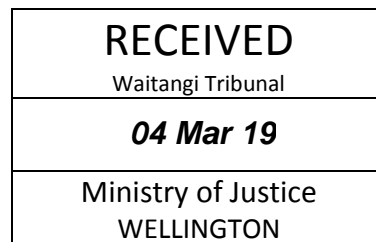
a claim by the **Māori Women's Welfare League Incorporated** and by others (Wai 381)

AND

IN THE MATTER OF

a claim by **Donna Awatere-Huata** of Ngāti Whakaue and Ngāti Porou on behalf of all Māori women (Wai 2494)

MEMORANDUM OF COUNSEL
Dated this 4th day of March 2019



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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed for and on behalf of the following claims:
 - a) **Wai 381**: a claim by the Māori Women's Welfare League Incorporated and by others; and
 - b) **Wai 2494**: a claim by Donna Awatere-Huata of Ngāti Whakaue and Ngāti Porou on behalf of all Māori women.
2. Counsel file this Memorandum to indicate support for the directions sought in the Memorandum of Counsel dated 30 January 2019 filed on behalf of Mrs Aroha Reriti-Crofts for and on behalf of the Māori Women's Welfare League.¹
3. In addition to the Memoranda counsel have filed in relation to this matter,² counsel also note that this suggestion was put forward for discussion during the judicial conference on 13 March 2018.³
4. Counsel seek urgent directions confirming the proposed approach to facilitate the grant of legal aid for those yet to have legal aid granted to them.

DATED at Rotorua this 4th day of March 2019



Annette Sykes



Rebekah Jordan



Jordan Bartlett
Counsel for Claimants

¹ Wai 2700, #3.1.123.

² Wai 2700, #3.1.12; Wai 2700, #3.1.28; and Wai 2700, #3.1.56.

³ Wai 2700, #4.1.1.