

IN THE WAITANGI TRIBUNAL

**WAI 2700
WAI 2917**

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 Huhana Lyndon concerning
mana wāhine representation in local
government

Memorandum of Counsel

Dated 20 March 2020

RECEIVED

Waitangi Tribunal

20 Mar 2020

Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed on behalf of Huhana Lyndon who brings this claim for and on behalf of her whanau and wāhine Māori elected as representatives to Local Government, the communities that they represent, and Māori in general.
2. This memorandum is filed in response to Tribunal directions dated 17 February 2020 directing counsel to make any submissions on any proposed updates, amendments or omissions from the list of claims intending to participating in this inquiry.¹
3. A statement of claim for Wai 2917 was filed and registered on the Wai 2700 Inquiry with the intention of participating fully in this inquiry,² however this claim was not included in the Tribunal's list of claims.³
4. Counsel submits that the Wai 2917 claim should be included in the list of claims intending on participating in this inquiry.
5. This claim is eligible to participate in this inquiry because:
 - a. The Claimant is Māori and able to bring a claim under section 6 of the Treaty of Waitangi Act 1975;
 - b. The claim issues are contemporary in nature; and
 - c. This claim is are not affected by inclusion in any previous Tribunal Inquiries or by Treaty settlements with the Crown.
6. For the avoidance of doubt, counsel confirms that the Wai 2917 claim wishes to be included in this inquiry and we seek leave for such an inclusion accordingly.
7. Counsel seeks leave to file this memorandum out of time and apologises for the delay in filing this memorandum.

Dated at Auckland this 20th day of March 2020



Brooke Loader

Counsel for the Claimants

TO: The Registrar, Waitangi Tribunal, Wellington;
All Counsel - Wai 2700 Mana Wāhine Kaupapa Inquiry

¹ Wai 2700, #2.5.13.

² Wai 2917, 1.1.1 dated 14 October 2019.

³ Wai 2700, #2.5.13(a).