

IN THE WAITANGI TRIBUNAL
KEI MUA I TE TARAIPUNARA

WAI 2700
WAI 2655

UNDER

The Treaty of Waitangi
Act 1975

CONCERNING

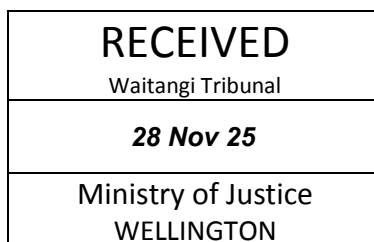
The Mana Wāhine
Kaupapa Inquiry

AND

A claim by Ngā Kairauhii
Nannies Against P Claim
(Wai 2655)

**MEMORANDUM OF COUNSEL FOR WAI 2655
FILING BRIEFS OF EVIDENCE**

Dated: 28 November 2025



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KIA WHAKAAE MAI TE TARAIPUNARA

1. This memorandum of counsel is filed on behalf of the Ngā Kairauhii Nannies Against P Claim, Wai 2655 (**claimants**).
2. The memorandum-directions dated 31 October 2025 directed claimants to file hearing two briefs of evidence and summaries by 5 pm, Friday 28 November 2025.¹
3. This memorandum accompanies the following briefs of evidence:
 - a. Brief of evidence of Lovey Matarita Edwards;
 - b. Brief of evidence of Ruku Areta Te Huia;
 - c. Brief of evidence of Memory Materori Jane Kaukau;
 - d. Brief of evidence of Bessie Manaena;
 - e. Brief of evidence of Hera Makere Ferris;
 - f. Brief of evidence of Ngatiriti King.
4. All briefs of evidence are less than 10 pages, and therefore no summaries are required.

Evidence presentation

5. Ms Edwards, Ms Te Huia and Ms Kaukau seek to present their evidence in hearing two concerning the rangatiratanga pou. Their evidence will outline the establishment of the Nannies Against P rōpū, and, critically, will address the significant funding barriers the rōpū has faced. The witnesses say these funding challenges reflect Crown actions and omissions that have failed to recognise and uphold their rangatiratanga as a wāhine Māori-led initiative, and have undermined the ability of such organisations to operate effectively.
6. The remaining witnesses seek leave to have their evidence taken as read.

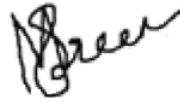
¹ Wai 2700, 2.6.9(b).

7. Leave is sought for all six witnesses to be available as a panel at hearing two to answer any questions the Tribunal or other parties may have.

Dated 28 November 2025



Bryce Lyall
Claimant Counsel



Maithili Sreen



Hannah Swedlund