

**IN THE WAITANGI TRIBUNAL**

**WAI 3060  
WAI 2823**

**IN THE MATTER OF**

The Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF**

The Justice System Kaupapa Inquiry  
(Wai 3060)

**AND**

**IN THE MATTER OF**

A claim by Katarina Jean Te Huia  
(Wai 2823)

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**MEMORANDUM OF COUNSEL  
DATED 23 JULY 2025**

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**RECEIVED**

Waitangi Tribunal

**23 Jul 25**

Ministry of Justice  
WELLINGTON

**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum of counsel is filed on behalf of Katarina Jean Te Huia, the named claimant for Wai 2823 (“the claimant”).
2. The claimant filed a brief of evidence<sup>1</sup> prior to He Rau Kōrero Tara ā Whare 4 which was held at Wellington on 24 June 2025 (“the Wellington wānanga”). The claimant then presented kōrero at the Wellington wānanga.
3. At the Wellington wānanga, Her Honour Judge Wainwright invited the claimant to file supplementary evidence regarding her role as a midwife and her observations regarding the interplay between this role and the criminal justice system.
4. Accordingly, counsel files alongside this memorandum a supplementary brief of evidence of the claimant.

**DATED** at Auckland on this 23<sup>rd</sup> day of July 2025



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**David Stone**



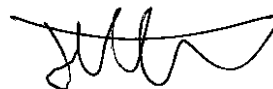
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**Catherine Leauga**



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**Paige Joy**  
**Counsel for the claimant**



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**Harry Clatworthy**

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<sup>1</sup> Wai 3060 #C034

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for the Wai 3060 Justice System Kaupapa Inquiry.