

IN THE WAITANGI TRIBUNAL**WAI 3553****WAI 3504****IN THE MATTER OF**

The Treaty of Waitangi Act 1975

AND**IN THE MATTER OF**

The Education Training and Amendment Act and Te Mātaiaho Urgent Inquiry (Wai 3553)

AND**IN THE MATTER OF**

A claim by Gazala Maihi on behalf of the New Zealand Post Primary Teachers' Association Te Wehengerua (Wai 3504)

MEMORANDUM OF COUNSEL**DATED 16 APRIL 2026**

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**RECEIVED**

Waitangi Tribunal

16 Apr 2026Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel (“memorandum”) is filed on behalf of Wai 3504, a claim by Gazala Maihi on behalf of the New Zealand Post Primary Teachers’ Association Te Wehengerua (“the Claimants”).
2. This memorandum is filed in accordance with the Tribunal’s Guide to Practice and Procedure which directs parties to serve documents electronically via the distribution list.¹
3. Counsel accordingly files the accompanying RNZ article entitled ‘A lot to learn from kura kaupapa Māori – Education Minister’.

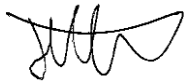
DATED at Tāmaki Makaurau this 16th day of April 2026



David Stone



Catherine Leauga



Harry Clatworthy



Sophie Gordon

¹ Waitangi Tribunal, Guide to Practice and Procedure, 5.10.

To: The Registrar, Waitangi Tribunal, Crown Law Office, and those on the notification list for the Wai 3553 Education and Training Amendment Act and Te Mātaiaho Urgent Inquiry