IN THE WAITANGI TRIBUNAL
KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI

WAI 3553

WAI 2959

UNDER	the Treaty of Waitangi Act 1975
IN THE MATTER OF	an application for urgent inquiry by Te Kapotai and Ngāti Hine (Wai 1464/1546, Wai 49 and Wai 682) in relation to the amendments to the Education and Training Act 2020 and the proposed Curriculum reset
AND	
IN THE MATTER OF	a claim by Dr Hope Tupara on behalf of te Ropu Wahine Maori Toko i te Ora/ the Maori Women's Welfare League Incorporated, its members, and all wāhine Māori of Aotearoa (Wai 2959)

MEMORANDUM OF COUNSEL FILING CHRONOLOGY

17 April 2026

This document is filed by:-

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RECEIVED
Waitangi Tribunal
17 Apr 2026
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed on behalf of Dr Hope Tupara and Te Ropu Wahine Maori Toko i te Ora/the Maori Women's Welfare League Inc (Wai 2959).

2. Counsel have prepared a chronology of key dates relating to the Crown's bundle filed on 16 April 2026, titled "Additional Documents of the Crown." To the extent it may assist the Tribunal in navigating that material, Counsel respectfully seek leave to file the chronology and append it to this memorandum.

DATED this 17th day of April 2026

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Kelly Dixon / Toni Talamaivao / Grace Taylor
Counsel for Wai 2959