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 17 APRIL 2026

Te Mata Law Limited
Barristers and Solicitors
PO Box 44331
Point Chevalier
AUCKLAND 1246
Tel: 0508-TEMATA (0508-836282)
Counsel Acting: David Stone | Catherine Leauga | Harry Clatworthy | Sophie Gordon | Mihikeita Tibble
David@tematalaw.co.nz|Catherine@tematalaw.co.nz | Harry@tematalaw.co.nz | Sophie@tematalaw.co.nz | Mihikeita@tematalaw.co.nz

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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 article by the then Chief Ombudsman and Chief Executive of the Department of the Prime Minister and Cabinet entitled 'Free and Frank Advice and the Official Information Act: balancing competing principles of good government'.[2]

DATED at Tāmaki Makaurau this 17th day of April 2026

David Stone **Catherine Leauga**

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

[2] Andrew Kibblewhite and Peter Boshier, "Free and Frank Advice and the Official Information Act: balancing competing principles of good government" (2018) 14 PQ 3-9.

Harry Clatworty **Sophie Gordon**

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