

IN THE WAITANGI TRIBUNAL

**WAI 2700
WAI 2864**

CONCERNING

the Treaty of Waitangi Act
1975

**AND
IN THE MATTER OF**

The Mana Wahine Inquiry
(Wai 2700)

**AND
IN THE MATTER OF**

A claim by Paula David,
Llani Harding, Georgina
Kerr and William Newton on
behalf of Te Rūnanga o Ngā
Toa Āwhina (the Rūnanga
of the New Zealand Public
Service Association) (Wai
2864).

**MEMORANDUM OF COUNSEL FILING CLAIMANT EVIDENCE TO BE
HEARD ON THE PAPERS FOR RANGATIRATANGA POU HEARING
WEEKS TWO AND THREE**

Dated this 14th day of April 2026

RECEIVED

Waitangi Tribunal

14 Apr 26

Ministry of Justice
WELLINGTON

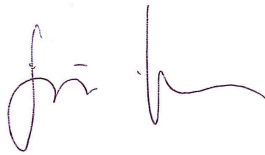


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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Wai 2864 – a claim by Paula Davis, Georgina Kerr, Liani Harding, and William Newton as named claimants on behalf of Te Rūnanga o Ngā Toa Āwhina – the Rūnanga of the New Zealand Public Service Association (“the Claimants”).
2. This memorandum is filed in respect of memorandum directions of her Honour Judge Reeves dated 15 December 2025, directing Counsel to file claimant evidence to be heard on the papers for Rangatiratanga Pou hearing weeks 2 and 3, no later than 5pm, Friday 10 April 2026.¹
3. On 10 April 2026, Counsel filed a memorandum seeking leave to file claimant evidence no later than 5 pm, Tuesday 14 April 2026.
4. Accordingly, this memorandum accompanies for filing as evidence in writing for the Rangatiratanga Pou a report of the Public Service Association Te Pūkenga Here Tikanga Mahi *Survey of Wāhine Māori Members – a summary of survey responses specific to leadership* dated February 2026.

DATED this 14th day of April 2026



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Tania Te Whenua
Claimant Counsel



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Lauren Chand
Claimant Counsel

¹ Wai 2700, #2.6.13(a).