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Waitangi Tribunal
8 Sep 2026
Ministry of Justice
WELLINGTON

IN THE WAITANGI TRIBUNAL **WAI 3553**
WAI 3310
WAI 3504

UNDER The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF The Education and Training Amendment Act and Te Mātaiaho Urgent Inquiry (Wai 3553)

AND

IN THE MATTER OF The Education Services and Outcomes Kaupapa Inquiry (Wai 3310)

AND

IN THE MATTER OF A claim by Gazala Maihi for and on behalf of the kaimahi Māori of the Post Primary Teachers' Association Te Wehengarua (PPTA) (Wai 3504).

MEMORANDUM OF COUNSEL
DATED 8 SEPTEBER 2026

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed for and on behalf of:

    a) Wai 3504 – a claim by Gazala Maihi for and on behalf of the kaimahi Māori of the Post Primary Teachers' Association Te Wehengarua (PPTA) (Wai 3504) ("the Claimant").

2. The Wai 3504 claim is currently participating in both the Wai 3310 Education Inquiry and the Wai 3553 Urgent Inquiry.

3. This memorandum is filed in response to a request from the Registrar dated 19 August 2026, seeking clarification as to who the claim is brought on behalf of.

CLARIFICATION OF CLAIMANT DESCRIPTION

4. The Wai 3504 statement of claim, evidence and submissions are made for and on behalf of the kaimahi Māori of the PPTA.

5. The Wai 3504 claim is supported by the PPTA as the professional association and trade union representing secondary school teachers and principals in New Zealand; representing the interest of its members; including the kaimahi Māori on whose behalf the claim is brought.

6. Counsel for the claimant confirms that the claim should be cited as:

    a) a claim by Gazala Maihi for and on behalf of the kaimahi Māori of the Post Primary Teachers' Association Te Wehengarua (PPTA).

DATED at Auckland this 8th day of September 2026

David Martin Stone **Catherine Leauga** **Harry Clatworthy**

Counsel for the Claimant

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for the The Education and Training Amendment Act and Te Mātaiaho Urgent Inquiry (Wai 3553) and The Education Services and Outcomes Kaupapa Inquiry (Wai 3310)