May it please the Court:

[1] Ms Roe initiated Judicial Review of Administrative Action against the University of Otago.

[2] In the first Case Management Conference, Ms Roe was instructed, by the Court, to further articulate or develop or extend or enlarge upon her statement of claim so as to make more particular allegations as to who the particular individuals were who were responsible and what kinds of damages, she thought they should pay.

[3] Ms Roe was very ambivalent about the Court having instructed her to magnify or enlarge her proceedings. She was concerned that the Court was instructing her to amend her pleadings in a way that turned the issue from a simple issue that she was clearly right about (that they should be required to supply an application to enrol in the programme of her and not their choosing, and then process that application on it's merits) into something that she was being set up to lose.

[4] Ms Roe did not have legal representation.

[5] Ms Roe filed an interlocutory seeking summary judgment on the part of her claim whereby the University be instructed to supply to her an application to enrol in the programme of her choosing. This is to say, Ms Roe requested summary judgment on the issue that the Public University of Otago be required to supply application to enrol forms to people who want to apply in various things, and then assess those applications on their merits. That is to say they are not entitled to allocate public training places (in the Medical Programme, for example) for private advantage by supplying (or withholding) applications or by selecting whatever students they want for arbitrary reasons that they are not being held accountable to. In the case of the University of Otago, their distinct preference for teenagers. They specifically want to be teaching teenagers to be giving abortions and euthanasia drugs and anaesthetic drugs and the like. They want very specifically for the youngest teenagers to be learning about and then watching and then acting under instructions or orders to then be doing these things.

[6] Ms Roe did not request lots of case management conferences – the Court instructed for there to be lots of case management conferences. They seemed to want Ms Roe to write, for them, quite the thesis. To drag out yet another year of 'wrongly decided' teenagers

for Medical Admissions while she slaves for the Courts with no legal degree, no lawyer, for no pay.

[7] In the substantive hearing of the issue the Justice said something to Ms Roe that the reason why he did not grant Ms Roe the summary judgment when it came to ordering or instructing the University to supply her with an application to enrol was because they would simply throw her application away once they received it (like they did her previous two applications), or there would be nothing to stop them from doing that. Or words to that effect. It should be in the transcript. That was the reason that was given for why Ms Roe was informed that her interlocutory request for summary judgment on part of the case was unsuccessful. But now Ms Roe is expected to pay the costs of the unsuccessful request for summary judgment.

[8] The courts are telling the Public Universities of New Zealand that New Zealand is not a free country. The Public Universities of New Zealand choose (much as the slave or detention camps of China choose) what 'Degree' is right for what students on the basis of whatever arbitrary reasons they like. They have the freedom to supply or withhold applications to enrol in various programmes for whatever arbitrary reasons they like and they have the freedom to throw away whatever applications they like for whatever arbitrary reasons they like. There is no rule of law when it comes to the allocation of Public Training Places for Private Advantage. That isn't something like 'Corruption' that's just how we do things, in New Zealand.

[9] That is to say, it was an injustice that Ms Roe's summary judgment was not deemed successful. It wouldn't have prevented a substantive hearing on the other issues. Presently the situation is that the Universities of New Zealand have presently been granted legal precedent by the Courts of New Zealand to supply (or withhold) applications to enrol from domestic adults. That is to say, the University's get to decide (on the basis of whatever arbitrary reasons that they like) what programme is right for what student. They can decide that the Degrees they, themselves, deem to be ''low-value'' are the only Degrees they will enrol certain people in, and that certain other Degrees they, themselves, consider ''High Value'' will only be certain other people who they have chosen on the basis of reasons that they are not accountable for.

[10] That is to say the court has pronounced that the Public Universities of New Zealand are free to allocate training places on the basis of whatever arbitrary reasons they like in a manner or way which is quite above the law. That is to say we are not a nation that is rule

by law and we are not a nation where people are free to choose what Degree to pursue. That is something that is decided by an elite white minority (that in fact appears to be the demographic of the people doing the choosing).

[11] Apparently there is no precedent for costs to be awarded to a self-represented litigant. Ms Roe has sought legal aid and no lawyer will fill out their section of the form. They claim to be 'conflicted' in anything to do with the Public Universities of New Zealand. Cannot see any corruption there, because they are conflicted out of seeing it.

[12] My problem is that it was the Court's direction that turned simpler filings into schedule 2B filings trying to encourage Ms Roe (as a self-represented litigant) to increase the complexity of the case. Saying that her request for a simple judgment, a summary judgment, on a simple issue, would not be granted in her favour.

[13] The University, also, could have put a stop to this simply by handing over an application and assessing it on it's merits. But they refused to do that. The Courts and the University both appear to be trying to deny justice to Ms Roe by delaying things, magnifying things, trying to make things larger so that more and more costs will be awarded against her so that she is forced to abandon seeking justice because she doesn't have money to pay for it. Which is, of course, not justice, at all.

[14] The University chose to file motion to have proceedings stuck out. Proceedings were not struck out. But somehow Ms Roe is expected to pay the costs involved in filing her request for summary judgment (where the judgment was not in her favour it was in the University's favour) and the costs involved in them filing motion to have proceedings struck out (where the judgment was in her favour and not in the University's given that proceedings were not struck out).

[15] Mr Sim says:

> *Had extensive effort not been devoted to these conferences the evidence and hearing would have had to address the far wider range of issues that had been raised or alluded to by the Applicant in her pleadings - including allegations of discrimination, and claims for damages and the removal of University personnel from office. Ultimately, confirmation of the abandonment of the last issue was only achieved after a Strike Out application was filed.*

[15] Ms Roe approached the courts requesting the University be instructed to supply applications so that people could apply to the programme of their (and not the University's) choosing. Ms Roe requested they be instructed to process the applications they then received according to the merits of the application. The courts chose to order many case management conferences and turn the case into something more substantive in an attempt to set Ms Roe up to fail in her pleadings. There needs to be teeth for the University 's refusal. Presently the Courts don't see anything wrong. We aspire to the slave-camps of China whereby the 'University' streams students through 'Degrees' they themselves consider low-value and refuse to allow the development of skilled work-force in NZ. Presently we are allowing the people struck off the practice registers over-seas to come here and torture and rape and murder people in our hospitals? That's the grand plan for cheap labour to staff the hospitals? The late-stage abortionists can come here, from Texas, and blog about the long arm of the law in NZ? That's the plan?

[16] Ms Roe has filed for the Case to be heard on Appeal. Ms Roe requests that costs be reserved (each party covers their own costs) until the Case has been heard on appeal. The only way the case will be prevented from being heard on appeal is if the courts deny Ms Roe justice because she cannot pay the courts whatever facilitation payment is needed for justice.

[17]

(a) the party who fails should pay costs to the party who succeeds;

[18] The Public University of Otago refuses to supply applications to enrol because they are allocating public training places for private advantage. Ms Roe is correct (substantively) that there is a gross injustice going on in Admissions (at the very least) at the University of Otago.

[19] But Ms Roe can't be substantively correct because she's self-represented and costs are never awarded to a self-represented litigant. There are presently papers being written where people actually wonder if this is fair. I suppose that is because the Universities have been deciding who to enrol in Law, too, so that the people they selected for that have no capacity at all to see or understand the most basic concepts of fairness or justice.