

IN THE WAITANGI TRIBUNAL **WAI 3400**
WAI 420
WAI 100
WAI 475
WAI 2767
WAI 2797
WAI 2809
WAI 2832

UNDER The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF The Marine and Coastal Area (Takutai Moana) Act Coalition Changes Urgent Inquiry

AND

IN THE MATTER OF A Claim by George Ngatiamu Matthews on behalf of Te Hika O Pāpāuma, and Others concerning the Marine and Coastal Area (Takutai Moana) Act 2011

**MEMORANDUM OF COUNSEL FILING CORRECTIONS TO DRAFT
TRANSCRIPT OF WAI 3400 STAGE TWO CLOSING SUBMISSIONS
HEARING
DATED 12 JUNE 2025**

RECEIVED
Waitangi Tribunal
13 Jun 25
Ministry of Justice WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of the following claimants:
 - a. Wai 420 George Matthews (Te Hika o Pāpāuma, northern Wairarapa);
 - b. Wai 475 Wanda Brljevič (Ngāti Huarere, eastern Coromandel);
 - c. Wai 100 John Linstead (Ngāti Hako, Hauraki);
 - d. Wai 2767 Jack Daymond (Te Aitanga O Ngā Uri O Wharekauri, Chatham Islands);
 - e. Wai 2797 Rangi Kemara (Ngaa Hapuu Maha O Maniapoto);
 - f. Wai 2809 Joseph Davis (Ngāti Hei, eastern Coromandel); and
 - g. Wai 2832 Makarita Tito (Ngāti Hua, Hokianga Harbour).

2. On 30 May 2025, His Honour Judge M P Armstrong made available the draft public transcript of the stage 2 closing submission of the Wai 3400 Inquiry, and invited parties to file any corrections to the transcript by 5pm, 13 June 2025.¹

3. Accordingly, a table with suggested corrections is filed alongside this memorandum as Appendix A.

Dated this 12th day of June 2025 at Tāmaki Makaurau


Alan Huarere

Counsel for the claimants

To: The Registrar, Waitangi Tribunal and Crown Law Office, and those on the notification list for Wai 3400 Marine and Coastal (Takutai Moana) Act Coalition Changes Urgent Inquiry.

¹ Wai 3400, #2.7.5