

IN THE WAITANGI TRIBUNAL

WAI 3400

**WAI 2604
WAI 2776
WAI 2778
WAI 2786
WAI 2787
WAI 2788
WAI 2789
WAI 2791**

UNDER THE

Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

the Marine and Coastal Area (Takutai Moana) Act Coalition Changes Urgent Inquiry (Wai 3400)

MEMORANDUM OF COUNSEL FILING CORRECTIONS TO THE CLOSING SUBMISSIONS HEARING TRANSCRIPT

Dated: 11 June 2025

RECEIVED Waitangi Tribunal
11 Jun 25
Ministry of Justice WELLINGTON

TamakiLegal
Barristers & Solicitors

Level 3, 2 Osterley Way, Manukau 2104
PO Box 75-517, Manurewa, Auckland 2243
P. 09 263 5240
E. darrell@tamakilegal.com

Counsel Acting: Darrell Naden | William McMaster

TĒNĀ, E TE TARAIPUNARA

1. This memorandum of counsel is filed on behalf of:
 - a. Maria Knight and Karena Karauria on behalf of Ngā Hapū o Tokomaru Ākau, Wai 2604;
 - b. Michael John Williams, on behalf of himself and Ngāi Tūpango, Wai 2776;
 - c. Kahura James Watene, on behalf of himself and Ngāi Tūkoko and Ngāti Moe, Wai 2778;
 - d. Rebecca Harper on behalf of the Pirere Whānau, Wai 2786;
 - e. Robert Gabel, on behalf of himself and Ngāti Tara, Wai 2787;
 - f. Violet Walker, on behalf of herself and Te Whānau o Rātāroa of Whangaroa, Wai 2788;
 - g. Rueben Taipari Porter, John Matiu, Christopher Takana Murray, Linda Waimirangi Matenga Harrison and Sandy Murupaenga on behalf of Te Iwi o Te Rarawa ki Ahipara, Wai 2789;
 - h. Malcolm J Kingi, on behalf of himself and Ngai Tāhū o Mōhaka ki Waikare, Wai 2791.

(the “**Claimants**”)

2. On 30 May 2025, his Honour Judge Armstrong released the draft transcript for the closing submissions hearing for stage 2 of the Wai 3400 inquiry. His Honour invited parties to review the transcript and directed that any requested corrections to the transcript be filed by 5pm, 13 June 2025.¹

¹ Waitangi Tribunal, *Memorandum-Directions of Judge M P Armstrong releasing the draft transcript for the stage two closing submissions hearing*, dated 30 May 2025, Wai 3400, #2.7.5 at [1] - [3].

3. Accordingly, a table of requested corrections to the draft transcript on behalf of the Claimants is attached as **Appendix "A"**.

Dated at **TĀMAKI MAKĀURAU** this **11th** day of **June 2025**



Darrell Naden | William McMaster
Counsel Acting