

IN THE WAITANGI TRIBUNAL OF NEW ZEALAND  
KEI MUA TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

**WAI 3400**

IN THE MATTER of the Treaty of Waitangi Act 1975

AND

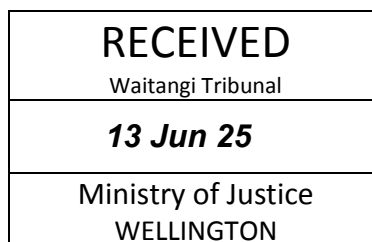
IN THE MATTER of the Marine and Coastal Area (Takutai Moana) Act  
Coalition Changes Urgent Inquiry (Wai 3400)

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**MEMORANDUM OF COUNSEL FILING CORRECTIONS  
TO THE STAGE TWO CLOSING SUBMISSIONS HEARING TRANSCRIPT**

**Dated 13 June 2025**

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**MAY IT PLEASE THE TRIBUNAL**

1. This Memorandum of Counsel is filed on behalf of the following interested parties in these proceedings:
  - (a) Ngā Hapū o Mōkau ki Runga;
  - (b) Ngāti Tara Tokanui Trust;
  - (c) Parengarenga A Incorporation;
  - (d) Rangitāne Tū Mai Rā Trust;
  - (e) Taruke Thomson on behalf of Ngāti Whakamarurangi/Tainui;
  - (f) Te Ruunanga o Ngaati Mahuta; and
  - (g) Te Whānau a Ruataupare.

**(Interested Parties)**

2. By Memorandum-Directions dated 30 May 2025, His Honour Judge Armstrong directed Counsel to file corrections to the transcript for the Stage Two Hearing week of the Marine and Coastal (Takutai Moana) Act Coalition Changes Urgent (Wai 3400) Inquiry, by **Friday, 13 June 2025**.<sup>1</sup>
3. **Attached at Appendix A** is a table of proposed corrections to the Stage Two Hearing transcript on behalf of the Interested Parties.

Dated 13 June 2025



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**Renika Siciliano/Cree Ratapu**  
Counsel for the Interested Parties

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<sup>1</sup> Memorandum-Directions releasing the draft transcript for the Stage Two closing submissions dated 30 May 2025 (Wai 3400, #2.7.5) at [3].