

BEFORE THE WAITANGI TRIBUNAL

**WAI 3400
WAI 125
WAI 354**

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

**AND
IN THE MATTER OF**

A claim by Angeline Greensill for
and on behalf of Tainui hapū o
Tainui waka (WAI 125)

**AND
IN THE MATTER OF**

A claim by Araneta Wikito Pomare
Hamilton and Marareia Hamilton
on behalf of the descendants of
Pōmare II and members of Ngāti
Manu, Te Uri Karaka, Te Uri o
Raewera and Ngāpuhi ki
Taumārere tribes (WAI 354)

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

Dated this 15th day of June 2025

RECEIVED Waitangi Tribunal
16 Jun 25
Ministry of Justice WELLINGTON

Solicitor: Address: Telephone: Email:	Annette Sykes Annette Sykes & Co. 8 – Unit 1 Marguerita Street ROTORUA 3010 P: 07-460-0433 asykes@annettesykes.com	Counsel: Address: Telephone: Email:	Jacki Cole PO Box 51159 TAWA 5249 0274 077 199 jacki@jcolebarrister.com
---	--	---	--

TĒNĀ E TE TARAIPUNARA:

1. This Memorandum of Counsel is filed on behalf of the following claims/claimants.
 - (i) Wai 125; a claim by Angeline Greensill for and on behalf of Tainui hapū o Tainui waka;
 - (ii) Wai 354; a claim by Arapeta Wikito Pomare Hamilton and Marareia Hamilton for on behalf on behalf of the descendants of Pōmare II and members of Ngāti Manu, Te Uri Karaka, Te Uri o Raewera, Ngāpuhi ki Taumārere tribes, Te Kawerau, and Ngāti Rongo o Mahurangi.
2. By memorandum-directions dated 30 May 2025,¹ the Presiding Officer released the draft transcript for the hearing of closing submissions held on 12 May 2025² and invited parties to review the transcript and submit any corrections to misspellings, typographical errors and missing words by no later than 5pm, 13 May 2025.
3. This Memorandum of Counsel files with it the corrections identified in the kōrero of counsel for Wai 125 and Wai 354.
4. Counsel seeks leave to file out of time and submits that no prejudice will arise for any party.

DATED at Rotorua and Whanganui-a-Tara on 15 June 2025

Annette Sykes

Jacki Cole

Maia Te Hira

Rōia mā ngā Kaikerēme

¹ Wai 3400, #2.7.5.

² Wai 3400, #4.1.003.