

TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 2358

I RARO I TE MANA O

te ture o te Tiriti o Waitangi 1975

Ā

I TE TAKE O

te pakirehua o te **National Fresh Water and Geothermal Resources** (Wai 2358)

**MEMORANDUM OF COUNSEL FILING CORRECTIONS TO THE DISCRETE
HEARING DRAFT TRANSCRIPT**

Date: 09 December 2025

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Counsel acting: T Waikato / V Tumai / T Henry / F Andi Lolo

RECEIVED Waitangi Tribunal
9 Dec 25
Ministry of Justice WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of:
 - a. Te Urunga Aroha Evelyn Kereopa on behalf of her whānau, and of Te Ihingārangi, a hapū of Maniapoto (Wai 762);
 - b. Anthony Whareraupo Olsen on behalf of the iwi Waitaha and Kāti Māmoe (Wai 2460);
 - c. Ian John Mitchell on behalf of Ngāti Hineira and Te Uri Taniwha of Ngāpuhi (Wai 1716);
 - d. Merle Ormsby, Tiaho Pillot, and Daniel Ormsby on behalf of themselves, and the descendants of Te Taawhi Patena Mariu and Rauaiterangi Mary Patena (Wai 1196);
 - e. Bryce Peda-Smith on behalf of himself and on behalf of the late Nuki Aldridge, and Te Taumata o Tangitu – the Tahawai (Aldridge) claim (Wai 2377);
 - f. Tauhara North No.2 Trust (Wai 3444); and
 - g. The Ngāti Tahu-Ngāti Whāoa Collective, comprised of:
 - i. Ngāti Tahu – Ngāti Whāoa Rūnanga Trust,
 - ii. Ngāti Tahu Tribal Lands Trust,
 - iii. Paeroa South B2B1 Trust,
 - iv. Tahorakuri A1 Sec 33b Ah Whenua Trust,
 - v. Tutukau East Z Trust,

- vi. Te Toke Marae,
- vii. Mataarae Marae,
- viii. Ohāki Marae, and
- ix. Waimahana Marae.


- 2. At paragraph [3] of Memorandum-directions dated 25 November 2025¹, his Honour, directed counsel to file any corrections to the transcript for the National Freshwater and Geothermal Resources Inquiry Stage Three Discrete Hearing held on 7 November 2025 by 5pm, Tuesday 9 December 2025.
- 3. Accordingly, attached as **Appendix A** to this Memorandum are the corrections to the transcript.

DATED at Tamaki Makaurau this 9th day of December 2025




Paul Majurey

Counsel Acting for Ngāti Tahu Ngāti Whāoa



Tania Waikato

Counsel Acting



Victoria Tumai

Counsel Acting



Tui Henry

Counsel Acting



¹ Waitangi Tribunal, *Memorandum-directions of the presiding officer releasing transcript for the Stage Three discrete hearing* dated 20 November 2025, Wai 2358, #2.6.143.

Ferdinand Andi Lolo

Counsel Acting