IN THE WAITANGI TRIBUNAL	**WAI 3325** **WAI 3285**
CONCERNING	the Treaty of Waitangi Act 1975
AND **IN THE MATTER OF**	The Climate Change Priority Inquiry
AND **IN THE MATTER OF.**	A claim by Lani Kereopa, Nicki Douglas, Roana Bennett and Mariana Te Rangi for and on behalf of themselves as representatives of their whānau, hapū and iwi and as representatives of Te Urunga o Kea the Te Arawa Climate Change Working Group

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MEMORANDUM OF COUNSEL FILING CORRECTIONS TO HEARING WEEK THREE TRANSCRIPT

Dated this 12th day of December 2025

RECEIVED
Waitangi Tribunal
12 Dec 25
Ministry of Justice
WELLINGTON

TE WHENUA LAW

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of Lani Kereopa, Nicki Douglas, Roana Bennett and Mariana Te Rangi for and on behalf of themselves as representatives of their whānau, hapū and iwi and as representatives of Te Urunga o Kea the Te Arawa Climate Change Working Group (Wai 3285).

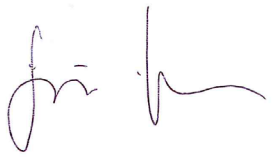
2. The Waitangi Tribunal convened hearing three for the Climate Change Priority Inquiry (Wai 3325) from 26 – 30 May 2025. The transcript for this hearing has been placed on the record as 4.1.7.

3. In memorandum-directions dated 27 November 2025, her Honour Judge Milroy directed claimant counsel to file any corrections to the transcript by no later than 5pm, 10 December 2025.[1]

4. Counsel apologises for the delay and seeks leave to file corrections out of time.

5. Accordingly, please find attached a table of proposed corrections of the transcript for hearing three (marked **Appendix A**).

DATED this 12th day of December 2025



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Tania Te Whenua
Claimant Counsel

……..
Lauren Chand
Claimant Counsel

[1] Wai 3325 #2.6.19, at paragraph [4].