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

WAI 3325
WAI 2003

IN THE MATTER OF	Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	Climate Change Priority Inquiry
AND	
IN THE MATTER OF	Cheryl Turner, John Klaricich, Harerei Toia (deceased), Ellen Naera, Fred Toi, Warren Moetara, Hone Taimona on behalf of Ngāti Korokoro, Ngāti Wharara, and Te Pouka hapū

MEMORANDUM OF COUNSEL FILING TRANSCRIPT CORRECTIONS

Dated this 9th day of December 2025

RECEIVED
Waitangi Tribunal
10 Dec 25
Ministry of Justice
WELLINGTON

This document is filed by:-

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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of Cheryl Turner, John Klaricich, Harerei Toia (deceased), Ellen Naera, Fred Toi, Warren Moetara, Hone Taimona on behalf of Ngāti Korokoro, Ngāti Wharara, and Te Pouka hapū ("**Wai 2003 claimants**").

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

3. In Memorandum-Directions dated 27 November 2025, Judge Milroy directed claimant counsel to file corrections to the draft transcripts no later than 5pm, 10 December 2025. [1]

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

DATED at Auckland this 9th day of December 2025.

Kelly Dixon / Harriett Morrow
Counsel for the Wai 2003 claimants

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