

**IN THE WAITANGI TRIBUNAL**

**WAI 3300  
WAI 3349**

**CONCERNING**

the Treaty of Waitangi Act  
1975

**AND  
IN THE MATTER OF**

Tōmokia ngā tatau o  
Matangireia – the  
Constitutional Kaupapa  
Inquiry

**AND  
IN THE MATTER OF**

A claim by Janice Panoho  
and Georgina Kerr on  
behalf of kaimahi Māori  
members of Te Pūkenga  
Here Tikanga Mahi, the  
New Zealand Public  
Service Association (Wai  
3349)

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**MEMORANDUM OF COUNSEL FILING  
WĀNANGA TUAONO TRANSCRIPT CORRECTIONS**

**Dated this 27<sup>th</sup> day of January 2026**

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**RECEIVED**

Waitangi Tribunal

**27 Jan 26**

Ministry of Justice  
WELLINGTON

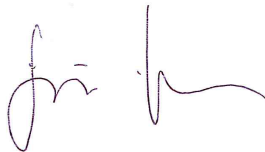


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**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum of counsel is filed on behalf of Wai 3349, a claim brought by Janice Panoho (Kaihautū) and Georgina Kerr (Kuia and Māngai) on behalf of kaimahi Māori members of Te Pūkenga Here Tikanga Mahi - the New Zealand Public Service Association (PSA).
2. The Waitangi Tribunal convened Wānanga Tuaono of the Tomokia ngā tatau o Matangireia – the Constitutional Kaupapa Inquiry (Wai 3300) from 1-4 December 2025. The transcript for this wānanga has been placed on the record as #4.1.13.
3. In memorandum-directions dated 23 January 2026, her Honour Kaiwhakawā Matua Fox directed claimant counsel to file any corrections to the transcript by no later than 5pm, 9 February 2026.<sup>1</sup>
4. Accordingly, please find attached a table of proposed corrections of the transcript (marked Appendix A).

DATED this 27th day of January 2026



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Tania Te Whenua  
Claimant Counsel



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Lauren Chand  
Claimant Counsel

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<sup>1</sup> Wai 3300 #2.6.80, at paragraph [3].