

**BEFORE THE WAITANGI TRIBUNAL  
KEI MUA I TE TARAIPUNARA**

**WAI 3060  
WAI 3462**

**UNDER** **The Treaty of Waitangi Act 1975**

**AND**

**IN THE MATTER OF THE** **Tomokio ngā tatau o Matangireia  
(Constitutional) Kaupapa Inquiry**

**AND**

**IN THE MATTER OF** **A claim by Owen Hape Kingi on  
behalf of himself, his hapū, Ngati  
Uru, Te Tahawai and Ngati  
Teketanumia, of Te Tai Tokerau  
region of Aotearoa**

---

**MEMORANDUM OF COUNSEL**

**Dated: 30 January 2026**

---

Counsel acting: Linda Thornton  
*Ara Moana Law*  
Barristers and Solicitors  
P O Box 475  
Waiuku 2341  
Auckland  
Ph: 021 130 9972  
[Linda@aramoanalaw.com](mailto:Linda@aramoanalaw.com)

**RECEIVED**

Waitangi Tribunal

**29 Jan 26**

Ministry of Justice  
WELLINGTON

**TĒNĀ, E TE ROPU WHAKAMANA I TE TIRITI**

1. This memorandum is filed on behalf of Wai 3462 a claim by Owen Hape Kingi.
2. On 23 January 2026, Her Honour Chief Judge Dr C L Fox released the transcript of Wananga Tuaono [#4.1.013] along with directions to submit any corrections to that transcript no later than 9 February 2026 [#2.6.80].
3. Accordingly, attached as Appendix A are corrections made on behalf of this claimant.

Dated: 30 January 2026



---

Linda Thornton, counsel for claimant