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KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I WAI 3300  
TE TIRITI O WAITANGI WAI 3352  
BEFORE THE WAITANGI TRIBUNAL

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**IN THE MATTER OF** The Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF** Tomokia Ngā Tatau o Matangieria – The  
Constitutional Kaupapa Inquiry (Wai 3300)

**IN THE MATTER OF** The New Zealand Māori Council Constitutional  
Claim (Wai 3352)

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**MEMORANDUM OF COUNSEL**

4 February 2026

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**WOODWARD LAW OFFICE**

**Counsel Acting:**

Donna Hall

Darshini Dorn

PO Box 30411

Lower Hutt 5010

+64 (04) 560 3680

[info@mokoia.co.nz](mailto:info@mokoia.co.nz)

**RECEIVED**

Waitangi Tribunal

**4 Feb 26**


Ministry of Justice  
WELLINGTON

**E TE KAIWHAKAWĀ, TĒNĀ KOE**

**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum is filed for and on behalf of Wai 3352 – a claim by Anne Kendall, Reverend Kereama Pene, Dr Kenneth Kennedy and Sharon Gemmel on behalf of the New Zealand Māori Council (“**NZMC**”).
2. In memorandum-directions dated 23 January 2026, Her Honour Chief Judge Fox released the draft transcript for Wānanga Tuaono, (Wai 3300, #4.1.13) and directed that corrections to the transcript be filed by 9 February 2026 (Wai 3300, #2.6.80).
3. In accordance with the directions above, counsel files alongside this memorandum “Appendix A” corrections to the transcript on behalf of the claimants listed at [1].

Dated at **Wellington** this Wednesday, 4 February 2026.



Donna Hall

**Woodward Law**



Darshini Dorn

**Woodward Law**