

IN THE WAITANGI TRIBUNAL
I ROTO I TE TARAIPUNARA WAITNAGI

WAI 3300
WAI 1716
WAI 2382

IN THE MATTER

of the Treaty of Waitangi Act 1975

AND

IN THE MATTER

of the Tomokia ngā tatau o
Matangireia: the Constitutional
Kaupapa Inquiry (Wai 3300)

**MEMORANDUM OF COUNSEL FILING CORRECTIONS TO THE DRAFT
TRANSCRIPTION FOR WĀNANGA TUAONO OF THE WĀNANGA A-RŌHE
PHASE (#4.1.013)**

Dated: 9 February 2026

RECEIVED Waitangi Tribunal
9 Feb 26
Ministry of Justice WELLINGTON

TamakiLegal
Barristers & Solicitors

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Counsel Acting: H J Fletcher / D C F Naden


MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of:
 - a. Ian John Mitchell, for and on behalf of himself, his whānau and Te Hikutu and Te Uri Taniwha hapū, and Ngāpuhi iwi (Wai 1716); and
 - b. Violet Eva Walker, on behalf of herself, her whānau and Ngāti Rangi o Waipapu ki Tawhiti and Ngāti Kahu ki Whangaroa (Wai 2382).
2. On 14 November 2025, Chief Judge Fox issued memorandum-directions inviting parties to review the draft transcript for the wānanga ā-rohe tuaono, which took place on 1 – 4 December 2025 at Te Tii Marae in Waitangi.¹ Parties were invited to submit any corrections to misspelling of place, typographical errors, missing words and events in their own kōrero no later than **5pm, Monday 9 February 2026**.²
3. Accordingly, **attached as Appendix A** are corrections to the draft transcript.

DATED at TAMAKI MAKAUROU this 9th day of February 2026



Hugo Fletcher
Counsel Acting



Darrell Naden
Counsel Acting

¹ Wai 3300, #4.1.013.

² Wai 3300, #2.6.080.