

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

Wai 3300

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 transcript corrections

Dated 9 February 2026

RECEIVED

Waitangi Tribunal

9 Feb 26

Ministry of Justice
WELLINGTON

Mahony Horner Lawyers

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TĒNĀ E TE TARAIPUUNARA
MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of:
 - a. Wai 58, a claim by Patricia Tauroa and Robyn Tauroa on behalf of ngā hapū o Whangaroa;
 - b. Wai 1312, a claim by the late Karanga Pourewa, Hinemoa Pourewa, the late Tarzan Hori, and William Hori on behalf of themselves and the descendants of Whakaki and te hapū o Ngāti Kawau;
 - c. Wai 1662, a claim by Leah Wright on behalf of herself, and on behalf of the Muriwhenua Hapū Collective;
 - d. Wai 1684, a claim by Doreen Puru, Anna Kahukura Hotere, the late Louie Katene, Emma Torckler, and William Puru on behalf of themselves, Te Hoia, Ngāti Rangimatamomoe and Ngāti Rangimatakaka;
 - e. Wai 2389, a claim by the late Tahua Murray, the late Rapine Hona, the late Louis Hohaia, the late Charlie Hikuwai, the late Mereihe Kool, Kawhena Paul, Jhanita Rhesa Gavala, Christina (Kiri) Batty and Melanie Joy Beauchamp on behalf of themselves and Ngāti Ruamahue;
 - f. Wai 2424, a claim by Maiki Marks, on behalf of herself, Harry Mahanga and Kitty Mahanga-Nisbet;
 - g. Wai 2945, a claim by Raewyn Louise Kapa, for and on behalf of the whānau of Te Rito Foundation;

(Claimants)

2. In Memorandum-Directions dated 23 January 2026, her Honour Chief Judge Fox released the draft transcript for te Wānanga Tuaono and invited parties to file corrections to the transcript by no later than 9 February 2026.¹

¹ Wai 3300, #2.6.80.

3. Counsel accordingly file, as **Appendix 'A'**, suggested corrections to the transcript.
4. We record that these corrections were compiled with direct input from the Claimants and that some of the suggested corrections (particularly those relating to pages 334–335) go slightly further than simply correcting missing or incorrect words. These suggested corrections are filed on instructions from the Claimants to ensure that the mana of their kōrero is maintained, and we respectfully seek the Tribunal's indulgence in adding them to the record of inquiry.

Dated at Te Whanganui-a-Tara this 9th day of February 2026



R M A Soriano, R K Gayfer, C B Fellowes and S E U Toleafoa
Counsel for the Claimants