

IN THE WAITANGI TRIBUNAL

WAI 3300

WAI 2920

IN THE MATTER OF

the Treaty of Waitangi Act
1975

AND

IN THE MATTER OF

Tomokia nga tatau o
Matangireia – the
Constitutional Kaupapa
Inquiry

AND

IN THE MATTER OF

a claim by Lorene Royal on
behalf of herself and her
whanau

HE MANATU RŌIA

I tēnei rā, i te rā 9 Huitanguru 2026



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Claimant Counsel:
Daniel Watkins & Manawa Johnson

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Waitangi Tribunal

9 Feb 26

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel is filed on behalf of Lorene Royal, for herself and on behalf of her whanau (“the Claimants”).

Procedural history

2. In Memorandum-Directions, Her Honour Judge Fox invited parties to correct any inaccuracies and typographical errors in the draft public transcript for Wananga Tuaono of the Constitutional Kaupapa Inquiry held at Te Tii Waitangi Marae, by 9 February 2026.¹
3. Counsel attaches to this Memorandum at Appendix A, Corrections to the draft transcript for Wananga Tuaono held at Te Tii Waitangi Marae, 1 – 4 December 2025.

DATED at Kaikohe this 9th day of February 2026



Daniel Watkins

Claimant Counsel

Manawa Johnson

Claimant Counsel

¹ *Waitangi Tribunal* Memorandum-Directions of Chief Judge Dr C Fox commencing wananga-a-rohe phase (Wai 3300, 2.6.19) at 15.