

IN THE WAITANGI TRIBUNAL

**WAI 3300
WAI 2710**

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 a collective of
Hokianga hapu and whanau
including Te Hikutu, Te Ihutai,
Te Uri o Te Aho, Kohatutaka,
Ngāti Kiore, Te Ihutai ki Orira,
Patutoka, Ngāti Te Reinga, Te
Mahurehure, Te Uri Kaiwhare,
Ngāti Pakau, Ngāti Pou, Te
Rauwawe and Mahuri Marae

HE MANATU ROIA

I tēnei rā, i te rā 9 Huitanguru 2026



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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 Claire Morgan, Anania Wikaira (deceased), Te Ipu Whakatara Absolum, Pairama Tahere, Oneroa Pihema (deceased), Fiona Reihana Ruka, Hinerangi Puru (deceased), Kyrke Watkins (deceased), Ellen Toki (deceased) on behalf of a collective of Hokianga whanau and hapu, including Te Hikutu, Te Ihutai, Te Uri o Te Aho, Te Kohatutaka, Ngāti Kiore, Te Ihutai ki Orira, Patutoka, Ngāti Te Reinga, Te Mahurehure, Te Uri Kaiwhare, Ngāti Pakau, Ngāti Pou, Te Rauwawe (“together 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.