

**IN THE WAITANGI TRIBUNAL
TOMOKIA NGĀ TATAU O MATANGIREIA –
THE CONSTITUTIONAL KAUPAPA INQUIRY**

**WAI 3300
WAI 966**

IN THE MATTER OF

the Treaty of Waitangi Act 1975

AND

**Tomokia Ngā Tatau o Matangireia – The
Constitutional Kaupapa Inquiry (WAI 3300)**

AND

**a claim by the late Te Kerei Tiatoa (Gray
Theodore), the late Pereme Porter, Rangimarie
Maihi, Yohanan Thomas Theodore, Arena Napia
Theodore, Murray Tauru Theodore, and William
Gray Theodore on behalf of Ngāpuhi (the
Ngāpuhi Te Tiriti o Waitangi claim) (WAI 966)**

MEMORANDUM OF COUNSEL FILING TRANSCRIPT CORRECTIONS

Dated 9 February 2026

RECEIVED

Waitangi Tribunal

10 Feb 26

Ministry of Justice
WELLINGTON

COUNSEL ACTING

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TE ĀRAHI LAW
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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the late Te Kerei Tiatoa (Gray Theodore), the late Pereme Porter, Rangimarie Maihi, Yohanan Thomas Theodore, Arena Napia Theodore, Murray Tauru Theodore, and William Gray Theodore on behalf of Ngāpuhi (the Ngāpuhi Te Tiriti o Waitangi claim) (**Wai 966**) (“the Claimants”).
2. By Memorandum-Directions dated 23 January 2026 (Wai 3300, #2.6.80), Her Honour directed parties to review the draft transcript of Wānanga Tuaono held at Te Tii Marae, Waitangi,¹ and to submit any corrections by **5pm, Monday 9 February 2026**.²
3. Counsel has attached a table with suggested corrections to the draft transcript as **Appendix “A”**.

DATED this 9th day of February 2026



Chris Beaumont
Counsel for the Claimants



Tekih Veikoso
Counsel for the Claimants

¹ Wai 3300, #2.6.80 at [1]-[2].

² Wai 3300, #2.6.80 at [3].