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KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I WAI 3300  
TE TIRITI O WAITANGI WAI 3352  
BEFORE THE WAITANGI TRIBUNAL

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IN THE MATTER OF The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF Tomokia Ngā Tatau o Matangieria – The  
Constitutional Kaupapa Inquiry (Wai 3300)

IN THE MATTER OF The New Zealand Māori Council Constitutional  
Claim (Wai 3352)

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**MEMORANDUM OF COUNSEL**

13 November 2025

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**RECEIVED**

Waitangi Tribunal

**13 Nov 25**

Ministry of Justice  
WELLINGTON

**E TE KAIWHAKAWĀ, TĒNĀ KOE**

**MAY IT PLEASE THE TRIBUNAL**

1. This Memorandum is filed for and on behalf of Wai 3352 – a claim by Anne Kendall, Sir Taihākurei Durie, Dr Kenneth Kennedy and Sharon Gemmel on behalf of the New Zealand Māori Council (“**NZMC**”).
2. By way of Memorandum-Directions dated 29 October 2025, Chief Judge Fox released the transcripts for the Wānanga Tuatoru and the Wānanga Tuawhā.<sup>1</sup>
3. Claimants are directed to file any corrections to both public transcripts by no later than 14 November 2025.
4. In accordance with her Honour’s directions, Counsel has attached the transcript corrections to this memorandum, marked “**Appendix A**”.

Dated at **Wellington** this Thursday, 13 November 2025.



Donna Hall

**Woodward Law**



Darshini Dorn

**Woodward Law**

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<sup>1</sup> Wai 3300, #2.6.74 at [1]-[2].