IN THE WAITANGI TRIBUNAL

WAI 1750
WAI 78

IN THE MATTER OF	**the Treaty of Waitangi Act 1975**
AND	
IN THE MATTER OF	**the North-Eastern Bay of Plenty District Inquiry (WAI 1750)**
AND	
IN THE MATTER OF	**a claim by Lucy Steel, Kaareen Hotereni and Ruahine Te Moana brought on behalf of Ngāi Tai (WAI 78)**

MEMORANDUM OF COUNSEL FOR WAI 78

Dated this 12th day of October 2026

RECEIVED
Waitangi Tribunal
12 Oct 26
Ministry of Justice
WELLINGTON

Oranganui Legal

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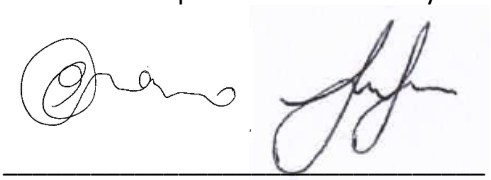
MAY IT PLEASE THE TRIBUNAL

Introduction

1. This memorandum of counsel is filed on behalf of Wai 78, a claim brought by Lucy Steel, Kaareen Hotereni and Ruahine Te Moana, on behalf of Ngāi Tai.
2. On 29 September 2026, the Waitangi Tribunal released the draft public transcript for hearing week 8 of the North Eastern Bay of Plenty (Wai 1750) District Inquiry, held on 23 March – 27 March 2026 at Maromahue Marae, Ōpotiki.[1] On 25 March, a judicial conference was held during hearing week 8.[2]
3. The Tribunal invited parties to correct any inaccuracies such as misspellings, typographical errors and missing words by no later than 5pm, 13 October 2026.[3]
4. Accordingly, counsel for Wai 78 file alongside this memorandum of counsel, **Appendix A**, which contains corrections to the Wai 1750 hearing week 8 transcript. **Appendix B** contains a minor correction to the Wai 1750 Judicial Conference for hearing week 8.

DATED at Paraparaumu this 12th day of October 2026



Eve Kahuwaero Rongo | Amylee Temese
Counsel for Wai 78

[1] Wai 1750, #4.1.026
[2] Wai 1750, #4.1.027
[3] Wai 1750, #2.6.074 at [3]-[4]