

IN THE WAITANGI TRIBUNAL

Wai 2358

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the National Fresh Water and Geothermal
Resources Inquiry

MEMORANDUM OF COUNSEL FILING CLAIMANT EVIDENCE

23rd December 2016

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RECEIVED

Waitangi Tribunal

23 Dec 2016

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This Memorandum of Counsel (“MoC”) is filed on behalf of the following parties:

- a.** Mr. Cletus Maanu Paul, on behalf of himself and the Mataatua District Maori Council (“DMC”);
- b.** Mrs. Titewhai Harawira, on behalf of herself and the Tamaki Makaurau DMC;
- c.** Mr. Des Ratima, on behalf of himself and the Takitimu DMC;
- d.** Mr. William Jackson, on behalf of himself and the Tamaki ki te Tonga DMC;
- e.** Mr. Rihari Dargaville, on behalf of himself and Te Tai Tokerau DMC;
- f.** Mr. Pita Paul, on behalf of himself and various Marae throughout Aotearoa;
- g.** Mr. Haami Piripi, on behalf of himself and the iwi of Te Rarawa (Wai 1699 Wai 1701);
- h.** Mr. Cletus Maanu Paul and Mr Charles Muriwai White, as members of Ngai Moewhare, a marae located in the rohe of Ngāti Manawa, and a claimant in Te Ika Whenua Inquiry (Wai 212); and
- i.** Ms. Michelle Marino and Mr. Erol Churton, on behalf of themselves, and the descendants of Taringa Kuri (Wai 377).

2. On the 16th November 2016, Counsel respectfully sought leave to file Claimant evidence for this Inquiry by the end of the day on the 23rd of December 2016.¹ His Honour granted the leave sought, and directed that it be filed no later than 12 pm Wednesday 21st December 2016.²

3. Counsel respectfully advises that I mistakenly read the filing date as the date sought, that is, the 23rd December 2016. Counsel sincerely apologises for any prejudice caused by the delayed filing resulting from this mistake.

¹ Wai 2358, #2.6.4 Memorandum-Directions dated 29th November 2016 at paragraph 5.

² As above, at paragraph 15.

4. The following Briefs of Evidence (“BoEs”) and accompanying Indexes and Annexures (“I and A”) will be filed shortly:

- a.** BoE of Mr. Cletus Maanu Paul, and I and A;
- b.** BoE of Mr. Haami Piripi, and I and A;
- c.** BoE of Mrs. Titewhai Harawira;
- d.** BoE of Mr. John Tamihere;
- e.** BoE of Mr. Des Ratima, and I and A;
- f.** BoE of Mr. Rihari Dargaville;
- g.** BoE of Mr. William Jackson;
- h.** BoE of Mr. Pita Paul, and I and A;
- i.** BoE Mr. Benjamin Pittman;
- j.** BoE of Mrs. Ruiha Collier;
- k.** BoE of Mrs. Michelle Marino, and I and A; and
- l.** BoE of Mr. Arthur Mahanga, and I and A.

Dated 23 December 2016



Janet Mason
Counsel Acting

