

IN THE WAITANGI TRIBUNAL

WAI 2358

IN THE MATTER of the Treaty of Waitangi Act 1975

AND IN THE MATTER of the National Freshwater and Geothermal Resources Inquiry

**MEMORANDUM OF COUNSEL FOR THE CLAIMANTS FILING
CUSTOM LAW PAPER**

Dated: 20 January 2017

Presiding Officer: Chief Judge Isaac

Next Event Date: 20 – 24 March 2017 (Hearing Week 2)



Solicitor Acting WOODWARD LAW PO Box 30411 LOWER HUTT Solicitor Acting: Donna Hall Telephone: (04) 560 3680 Email: info@mokoia.co.nz	Counsel Acting RICHARD FOWLER QC Capital Chambers PO Box 10048 WELLINGTON Telephone: (04) 471 1084 Email: email@richardfowler.co.nz	Counsel Acting: MATTHEW SMITH Thorndon Chambers PO Box 1530 WELLINGTON 6140 Telephone: (04) 460 0749 Email: matthew.smith@chambers.co.nz
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MAY IT PLEASE THE TRIBUNAL:

1. This memorandum is filed on behalf of claimant, New Zealand Māori Council (Wai 2358), in response to memorandum-directions of the Tribunal dated 29 November 2016 (Wai 2358 #2.6.4) and for the purposes of filing evidence in relation to customary law as per paragraph [16].
2. Woodward Law are unable to file evidence in relation to customary law on the 20th January 2017. We propose to file the customary law evidence on the 23rd January 2017.
3. Woodward Law ask for this extension over the weekend to file due to the large volume of writing that has come in overnight from our researchers who are spread throughout the country which must be reviewed and referenced before filed.
4. Woodward Law notified Jenny Syme and Crown Law as to our request for an extension over the weekend on the 19th January 2017 and the morning of the 20th January 2017 respectively, both agreed that considering the circumstances this was not an unreasonable request.
5. As per paragraph [16] of Tribunal direction #2.6.4 Dr Sue Jackson is available to appear in hearing week 2.

DATED at Wellington this 20th of January 2017.



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D Hall/G Davidson

Solicitors for the Claimant