

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

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**AFFIDAVT OF JORDAN DAVID HAMEL****Dated:** 2 February 2017

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**Presiding Officer:** Chief Judge Isaac**Next Event Date:** 26-30 June 2017 (hearing week 2 of 3)**RECEIVED**

Waitangi Tribunal

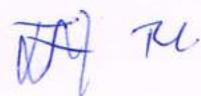
**7 Feb 2017**Ministry of Justice  
WELLINGTON

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I, **JORDAN DAVID HAMEL**, swear:

1. I am a Solicitor currently employed at Woodward Law Offices, counsel for lead claimants New Zealand Maori Council (NZMC) in the National Freshwater & Geothermal Resources Inquiry (Wai 2358).
2. This affidavit is for the purposes of setting out the processes by which answers to questions in writing filed by Bennion Law (dated 28 November 2016) have been provided to the Tribunal.
3. The document containing answers to Bennion Law's questions is the result of a collaborative process of consultation with the tangata whenua witnesses named in Bennion Law's memorandum (3.2.24 Wai 2358).
4. On 23 December 2016, a document with potential answers inviting comments and feedback from the relevant witnesses was circulated to all witnesses listed by Bennion law for questioning. This document was circulated again on 30 January 2017.
5. Several witnesses provided feedback on the answers which was incorporated into the document and re-circulated on the morning of 3 February 2017, seeking final comments and consent.
6. The following witnesses have consented, either via telephone or email to the filing of these answers: Hira Huata, #D27; Marei Apatu, #D93; Taipari Munro, #D17; Millan Ruka, #D18; Meryl Carter, #D19; Hugh Sayers, #D36; Rudy Taylor, #D26; Walter Rika, #A12; Kereama Pene, #D38; Tamati Cairns, #D37; Toro Bidois, #D13; Pia Callaghan, #D34, Robert MacDonald #D28.




7. Dennis Emery (#D35) is a significant client of Woodward Law Office's and his instructions in regards to the issues raised in these questions of clear. While we believe that he will also agree with the answers filed herein but we have been unable to contact him for agreement.
8. Pia Callaghan has submitted an individual answer to Question 1.
9. Dr. Adele Whyte is going to file her own answers with the Tribunal.
10. There has been significant difficulty contacting all named witnesses over the holiday period and therefore the answers to Bennion Law's questions are only filed on behalf of those witnesses listed in paragraph 6.

Sworn at Lower Hutt this )  
3<sup>rd</sup> day of February 2017 )



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Jordan David Hamel

Before me: 

T. Uini Paulo  
Deputy Registrar

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A Solicitor of the High Court of New Zealand

Hutt Valley District Court

District Court Hutt Valley.