

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 THE BRIEF OF EVIDENCE OF
GREGORY JOHN CARLYON**

10 February 2017

RECEIVED

Waitangi Tribunal

10 Feb 2017

Ministry of Justice
WELLINGTON

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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 1st of February 2017, His Honour directed Counsel to file all remaining evidence for this Inquiry by the 10th of February 2017.¹

¹ Wai 2358, #2.6.10 at paragraph 19.

3. This Memorandum of Counsel (“MoC”) files the Brief of Evidence and Index and Annexures of Gregory John Carlyon.

Dated 10 February 2017



Janet Mason
Counsel Acting