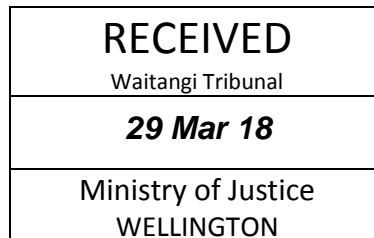


**IN THE WAITANGI TRIBUNAL****WAI 898  
WAI 125****IN THE MATTER OF** the Treaty of Waitangi Act 1975**AND****IN THE MATTER OF** Te Rohe Pōtae Inquiry (WAI 898)**AND****IN THE MATTER OF** a claim by **Haami Whakatari Kereopa, Angeline Ngahina Greensill and Vivian Te Urunga Morell Kawharu** on behalf of Ngāti Koata (ki Whaingaroa), Ngāti Kahu, Ngāti Tahau, Ngāti Te Kore, Ngāti Pukoro, Ngāti Te Ikaunahi, Ngāti Tira, Ngāti Heke, Ngāti Rua Aruhe, Ngāti Hounuku, Paetoka and Ngāti Te Karu (Wai 125)

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**MEMORANDUM OF COUNSEL**Dated this 29<sup>th</sup> day of March 2018

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**Annette Sykes & Co.**  
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**MAY IT PLEASE THE TRIBUNAL**

1. This Memorandum of Counsel is filed for and on behalf of:
  - a) **Wai 125** a claim by Haami Whakatari Kereopa Angeline Greensill and Vivian Te Urunga Morell Kawharu) and others on behalf of Ngāti Koata (ki Whaingaroa), Ngāti Kahu, Ngāti Tahau, Ngāti Te Kore, Ngāti Pukoro, Ngāti Te Ikaunahi, Ngāti Tira, Ngāti Heke, Ngāti Rua Aruhe, Ngāti Hounuku, Paetoka and Ngāti Te Karu.
2. This memorandum is filed in response to her Honour's request for further information explaining how the appendices counsel filed with our previous memorandum<sup>1</sup> are relevant to the proposed plan for reporting and/or issues to be given priority in this inquiry.
3. In accordance with her Honour's request, counsel file with this memorandum the Affidavit of Mrs Greensill. We note that the Affidavit is unsworn and a sworn version will be filed as soon as it is received. Mrs Greensill lives in a rural area and is unable to swear her Affidavit before an authorised person at present.

**DATED** at Rotorua this 29<sup>th</sup> day of March 2018



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Annette Sykes



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Rebekah Jordan



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Jordan Bartlett  
Counsel for Claimants

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<sup>1</sup> Wai 898, #3.5.52, #3.5.52(a) and #3.5.52(b), 14 March 2018.