

**BEFORE THE WAITANGI TRIBUNAL**

**WAI 1750  
WAI 864  
WAI 2592**

**IN THE MATTER OF**

the Treaty of Waitangi Act  
1975

**AND**

**IN THE MATTER OF**

claims relating to the North-  
Eastern Bay of Plenty Inquiry  
District (**WAI 1750**)

**AND**

**IN THE MATTER OF**

a claim by **John Hata, Russell  
Hollis, and John Brown** for  
Moutohora Quarry (**WAI 864  
and WAI 2592**)

---

**MEMORANDUM OF COUNSEL  
Dated this 23<sup>rd</sup> day of August 2019**

---



---

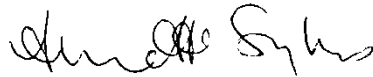
**Annette Sykes & Co**  
Barristers & Solicitors  
8 – Unit 1 Marguerita Street  
Rotorua, 3010  
Phone: 07-460-0433  
Fax: 07-460-0434

Counsel Acting: Annette Sykes / Rebekah Jordan / Jordan Bartlett  
Email: [asykes@annettesykes.com](mailto:asykes@annettesykes.com) / [rebekah@annettesykes.com](mailto:rebekah@annettesykes.com) /  
[jordan@annettesykes.com](mailto:jordan@annettesykes.com)

**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum of counsel is filed on behalf of **Wai 864**, a claim by **John Hata, the late Russell Hollis, and John Brown and the Māori Trustee for and on behalf of the owners of Whakapaupākihi No 2** and **Wai 2592**, a claim by **John Hata, the late Russell Hollis and John Brown** (“the claimants”).
2. This memorandum addresses the inclusion of the Wai 2592 claim in the list of Wai claims that fall partly or entirely within the District Boundary of the North Eastern Bay of Plenty Inquiry.
3. The issues raised in the Wai 2592 claim remain live and the claimants see it as appropriate that it be included in this Inquiry.
4. The claimants ask that the Wai 864 claim and the Wai 2592 claim be heard jointly together and that all future memoranda and evidence herein after are filed on behalf of both claims.

**DATED** at Rotorua this 23<sup>rd</sup> day of August 2019



---

Annette Sykes



---

Rebekah Jordan



---

Jordan Bartlett  
Counsel for Claimants