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BEFORE THE WAITANGI TRIBUNAL
TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI **WAI 2700**

IN THE MATTER of the Treaty of Waitangi Act 1975

AND

IN THE MATTER of the Mana Wahine Kaupapa Inquiry (Wai 2700)

MEMORANDUM OF COUNSEL FILING PROPOSED WITNESSES FOR PRESENTATION OF ORAL EVIDENCE AT TŪĀPAPA HEARING ONE

14 December 2020

KĀHUI LEGAL

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of coordinating counsel (Kāhui Legal, Tamaki Legal and Tukau Law) for the Wai 2700 Mana Wahine Kaupapa Inquiry.

2. By way of Memorandum-Directions dated 7 December 2020, the Presiding Officer directed claimant counsel to file confirmation of proposed witnesses for the presentation of oral evidence at the tūāpapa hearings by **12pm, Friday 11 December 2020**.[1]

3. By way of email dated 11 December 2020, the Presiding Officer granted extensions to file proposed witnesses for the presentation of oral evidence at tūāpapa hearing one by **5pm, Monday 14 December 2020** and for all remaining tūāpapa hearings by **5pm, Thursday 24 December 2020**.

4. This memorandum attaches as **Appendix A** the proposed witnesses for the presentation of oral evidence at tūāpapa hearing one.

5. Claimant counsel have provided coordinating counsel with an initial indication of which tūāpapa hearing their clients intend to present evidence. The current numbers are as follows:[2]

   (a) hearing one (Kerikeri): 31 claims / 68 witnesses;

   (b) hearing two (Ngāruawāhia): 29 claims / 56 witnesses; and

   (c) hearing three/four (Lower North Island/South Island): 17 claims / 42 witnesses.

6. Coordinating counsel are concerned with the available hearing time at hearings one and two and indicate that additional hearing time in the upper North island appears to be necessary.

7. Coordinating counsel note that claimant counsel are due to file the final hearing timetable for tūāpapa hearing one on Friday 18 December.

[1] Wai 2700, #2.5.36.
[2] Note that where witnesses have indicated they will present together this has been counted as one witness.

Coordinating counsel intend to meet this week to discuss the issue of timetabling, following which counsel will provide an update to the Tribunal.

DATED this 14th day of December 2020

N R Coates / P T Walker / T N Hauraki / J E Judge
On behalf of coordinating counsel