

IN THE WAITANGI TRIBUNAL

Wai 1750

CONCERNING

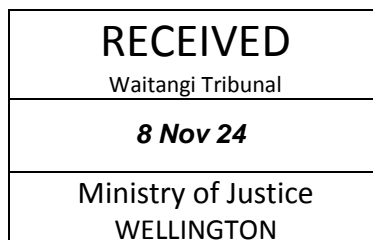
the Treaty of Waitangi Act 1975

AND

the North-Eastern Bay of Plenty
District Inquiry

**MEMORANDUM OF COUNSEL ASSIST FILING RESPONSES OF JOHN
MCLELLAN TO QUESTIONS OF CLARIFICATION**

8 November 2024



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MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed by counsel assisting the Waitangi Tribunal commissioned expert witness, John McLellan.
2. On 16 August 2024, the Presiding Officer Judge Michael Doogan directed that any questions of clarification for expert witnesses for hearing 3 of the North-Eastern Bay of Plenty District Inquiry, scheduled for 18–22 November 2024, be filed by 24 October 2024 (Wai 1750, #2.6.8 & #2.6.8(a)).
3. In the same direction, the Presiding Officer directed for responses to the questions of clarification be filed by 5pm, 7 November 2024.
4. On 25 October 2024, Te Mata Law filed questions of clarification for the expert witnesses presenting at hearing 3 of this inquiry, including questions for John McLellan (Wai 1750, #3.2.61 & #A3(c)).
5. On 29 October 2024, Crown counsel filed questions of clarification for the expert witnesses presenting at hearing 3 of this inquiry, including questions for John McLellan (Wai 1750, #3.2.64 & #A3(d)).
6. On 7 November 2024, counsel sought an extension to file the responses to the questions on behalf of John McLellan.
7. Accordingly, this memorandum of counsel files the responses to the questions of clarification on behalf of John McLellan on his report 'Raupatu and Compensation in the North-Eastern Bay of Plenty, 1865-1874' (Wai 1750, #A3 & #A3(a)).

Dated: 8th November 2024



Sophie Gordon / Natalya Holmes-Mustart
Counsel Assist