

IN THE WAITANGI TRIBUNAL
KEI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI

WAI 1750
WAI 203

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND of North-eastern Bay of Plenty inquiry (Wai 1750)

AND a claim by Karen Stefanie Mokomoko, Pita Tori
Biddle and Tākerei Peck, for and on behalf of Te
Whānau a Mokomoko (Wai 203)

JOINT MEMORANDUM OF COUNSEL FILING BUNDLES FOR CROSS
EXAMINATION
DATED 13 NOVEMBER 2024



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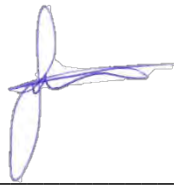

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MAY IT PLEASE THE TRIBUNAL:

1. This Joint Memorandum of Counsel is filed jointly by Karen Stefanie Mokomoko and Pita Tori Biddle, represented by McCaw Lewis and Takerei Peck, represented by Wackrow Panoho and Associates, for and on behalf Te Whānau a Mokomoko, Wai 203 (the **Claimants**).
2. This memorandum of counsel is filed in response to Memorandum Directions Wai 1750 2.6.08(a), wherein His Honour directed that bundles for cross examination of technical witnesses at Hearing Week Three be filed by 5pm 12th November 2024.¹
3. Counsel apologise for filing out of time and seek leave for the same.
4. Attached and marked "Appendix A" is a bundle of documents for cross-examination. The bundle includes the following documents:
 - 4.1. "Mokomoko – Our Tupuna" by Kevin Were;
 - 4.2. Wai 849, #B019 – Brief of Evidence of Tuiringa (Mani) Mokomoko;
 - 4.3. Wai 894, #B018 – Brief of Evidence of Keri Huia Ratima; and
 - 4.4. "Wai 203 and Wai 339 Research Report" by Ewan Johnston.

DATED at Tāmaki Makaurau and Kirikiriroa this 13th day of November 2024



Raewyn Clark / Josi Witehira
Counsel for Takerei Peck



Renika Siciliano / Carmen Mataira
Counsel for Karen Stefanie Mokomoko

¹ Wai 1750, #2.6.001 at paragraph 8.
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