

IN THE WAITANGI TRIBUNAL OF NEW ZEALAND
KEI MUA TE ROOPUU WHAKAMANA I TE TIRITI O WAITANGI

WAI 3400

IN THE MATTER of the Treaty of Waitangi Act 1975

AND

IN THE MATTER of claims concerning the Marine and Coastal Area (Takutai Moana) Act 2011

MEMORANDUM OF COUNSEL REGARDING CROSS-EXAMINATION INDICATIONS

Dated 12 March 2025

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Waitangi Tribunal

12 Mar 2025

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of the following interested parties in these proceedings:
 - (a) Ngā Hapū o Mōkau ki Runga;
 - (b) Ngāti Tara Tokanui Trust;
 - (c) Parengarenga A Incorporation;
 - (d) Rangitāne Tū Mai Rā Trust;
 - (e) Taruke Thomson on behalf of Ngāti Whakamarurangi/Tainui;
 - (f) Te Ruunanga o Ngaati Mahuta; and
 - (g) Te Whānau a Ruataupare.
2. By Memorandum-Directions dated 18 December 2024, Judge Armstrong directed that cross-examination indications are to be filed by Tuesday, 12 March 2025.¹
3. Accordingly, counsel seeks leave to question:
 - (a) Ms Frances Makuini Dagg (Wai 3400, #B1) for 20 minutes; and
 - (b) Mr Harry James Dale Kent (Wai 3400, #B2) for 10 minutes.
4. Counsel will coordinate with other parties to ensure efficiency and avoid unnecessary duplication.

Dated 12 March 2025



Renika Siciliano/Cree Ratapu
Counsel for the Claimants

¹ Memorandum-Directions of Judge Armstrong (Wai 3400, #2.6.3) dated 18 December 2024; Appendix A - Inquiry timetable for stage two of the Marine and Coastal Area (Takutai Moana) Act Coalition Changes Urgent Inquiry (Wai 3400, #2.6.3(a)).