IN THE WAITANGI TRIBUNAL

WAI 2200
WAI 2139

IN THE MATTER	of the Treaty of Waitangi Act 1975
AND	
IN THE MATTER	of the Porirua ki Manawatū Inquiry (Wai 2200)
AND	
IN THE MATTER	of a claim by Timothy Tukapua and Dennis Greenland on behalf of Muaūpoko and the Muaūpoko Tribal Authority (Wai 2139)

MEMORANDUM OF COUNSEL

Dated: 2 September 2025

BENNION LAW

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Waitangi Tribunal
2 Sep 2025
Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL:

1. This memorandum is filed on behalf of Timothy Tukapua and Dennis Greenland who bring this claim on behalf of Muaūpoko and the Muaūpoko Tribal Authority (Wai 2139).

2. Mr Stirling's responses to questions in writing by Dr Grant Phillipson following hearing three of the wider inquiry phase were due to be filed by 2 September.[1]

3. Accordingly, attached as **Appendix A** are Mr Stirling's responses to questions regarding his *Twentieth Century Muaupoko Land Alienation and Administration Report* (Wai 2200, #A222). Attached as **Appendix B** are responses to questions about his *Muaūpoko Gap-Filling Research Report* (Wai 2200, #A252).

4. Due to the size, documents requested by Dr Phillipson are available via this Dropbox link.[2] Mr Stirling also makes reference to a number of maps which are attached as **Appendix C**.

Dated at Wellington this 2nd day of September 2025

Tom Bennion / Emma Whiley / Kudrat
Counsel for the claimants

1 Wai 2200, #2.6.302 and #2.6.302(a).

2 https://www.dropbox.com/scl/fi/4sriom82glof60xw4b4ay/A252-Answers-Docs.pdf?rlkey=72glyvnqu8ndwxkqas5djfrn8&st=mmt6sfef&dl=0