

I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

WAI 2358

KEI RARO I TE MANA O

te ture o te Tiriti o Waitangi 1975

Ā

I TE TAKE O

te pakirehua **National Fresh Water and Geothermal Resources** (Wai 2358)

Ā

I TE TAKE O

tētahi kerēme nā **Te Urunga Aroha Evelyn Kereopa** mō tōna **whānau**, me ētahi mema o te hapū o **Te Ihingārangi** o Maniapoto (Wai 762)

MEMORANDUM OF COUNSEL FILING CROSS-EXAMINATION DOCUMENTS

Dated 29 October 2025

RECEIVED

Waitangi Tribunal

29 Oct 25

Ministry of Justice
WELLINGTON

TamakiLegal

Barristers & Solicitors

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Counsel acting: V Tumai | T Henry

Ā

I TE TAKE O

tētahi kerēme nā **Anthony Whareraupo Olsen, Trudy Elizabeth Paatu Olsen, me Kathryn Fiona Wheturereata Olsen**, mō ngā iwi o **Waitaha** me **Kāti Māmoe** (Wai 2460)

Ā

I TE TAKE O

tētahi kerēme nā **Ian John Mitchell** mō ngā hapū o **Ngāti Hineira** me **Te Uri Taniwha** o **Ngāpuhi** (Wai 1716)

Ā

I TE TAKE O

tētahi kerēme nā **Merle Ormsby, Tiaho Pillot** me **Daniel Ormsby**, mō a rātou whānau, me ngā uri o **Te Taawhi Patena Mariu** rāua ko **Rauaiterangi Mary Patena** (Wai 1196)

Ā

I TE TAKE O

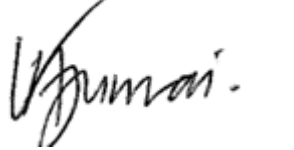
tētahi kerēme nā **Bryce Peda Aldridge**, mōna, nā runga anō i te tono o **Nuki Aldridge** (kua mate), me **Te Taumata o**

Tangitu – The Tahawai (Aldridge) claim
(Wai 2377)

MAY IT PLEASE THE TRIBUNAL

1. This memorandum of counsel is filed on behalf of:
 - a. Te Urunga Aroha Evelyn Kereopa on behalf of her whānau, and of Te Ihingārangi, a hapū of Maniapoto (Wai 762);
 - b. Anthony Whareraupo Olsen on behalf of the iwi Waitaha and Kāti Māmoe (Wai 2460);
 - c. Ian John Mitchell on behalf of Ngāti Hineira and Te Uri Taniwha of Ngāpuhi (Wai 1716);
 - d. Merle Ormsby, Tiaho Pillot, and Daniel Ormsby on behalf of themselves, and the descendants of Te Taawhi Patena Mariu and Rauaiterangi Mary Patena (Wai 1196); and
 - e. Bryce Peda-Smith on behalf of himself and on behalf of the late Nuki Aldridge, and Te Taumata o Tangitu – the Tahawai (Aldridge) claim (Wai 2377).
2. By way of Memorandum-directions dated 24 September 2025¹, his Honour, directed counsel to file cross-examination documents for the discrete hearing by Wednesday 29 October 2025.
3. Attached for filing and by way of service is the Tamaki Legal Cross-examination bundle.

DATED at Tamaki Makaurau this 29th day of October 2025



Victoria Tumai
Counsel Acting



Tui Henry
Counsel Acting

¹ Waitangi Tribunal, *Appendix A: Updated inquiry timetable for stage three of the National Freshwater and Geothermal Resources Inquiry (Wai 2358)* dated 24 Hepetema 2025, Wai 2358, #2.6.138(a).