KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA	**WAI 2200**
I TE TIRITI O WAITANGI	**WAI 113A**
BEFORE THE WAITANGI TRIBUNAL	

IN THE MATTER OF	The Treaty of Waitangi Act 1975
AND	
IN THE MATTER OF	the Porirua ki Manawatū District Inquiry (Wai 2200)
AND	
IN THE MATTER OF	a claim by Dennis Emery on behalf of Ngāti Hinepare (Wai 113A)

MEMORANDUM OF COUNSEL REGARDING WRITTEN QUESTIONS FROM DR GRANT PHILLIPSON

5 August 2026

WOODWARD LAW OFFICE

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RECEIVED
Waitangi Tribunal
5 Aug 2026
Ministry of Justice
WELLINGTON

AND

IN THE MATTER OF a claim by Rachael Selby on behalf of Ngāti Pareraukawa (Wai 113A)

AND

IN THE MATTER OF a claim by Pita Savage and Robbie Richardson on behalf of Ngāti Parewahawaha (Wai 113A)

MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed on behalf of:

    1.1. Dennis Emery on behalf of Ngāti Hinepare (Wai 113A);

    1.2. Rachael Selby on behalf of Ngāti Pareraukawa (Wai 113A); and

    1.3. Pita Savage and Robbie Richardson on behalf of Ngāti Parewahawaha (Wai 113A).

2. Written questions following Hearing Week 5 of the Wider Inquiry phase were expected from the Tribunal and counsel granted leave on Tuesday 28 July 2026.

3. In directions dated Friday 31 July 2026, the Tribunal provided written questions and indicated that further questions from Dr Grant Phillipson would be filed in due course.[1]

4. Bennion Law filed written questions for Tā Taihākurei Durie on Monday 3 August 2026.

5. The time of the following witnesses in this stage of the inquiry is being compensated through a contract with the Crown Forestry Rental Trust (CFRT):

    5.1. Tā Taihākurei Durie,

    5.2. Pakake Winiata,

    5.3. Jerald Twomey,

    5.4. Rawiri Rikihana,

    5.5. Linda Te Aho, and

    5.6. Dr Robert Joseph.

[1] Wai 2200, #2.6.326.

6. This contract allocates specific hours to each of these witnesses. Te Hono ki Raukawa Trust is meeting on Thursday 6 August 2026 to discuss the funding contract and upcoming work in this inquiry.

7. Counsel anticipates that we may have to arrange a variation to the contract with CFRT in order to cover costs required for each witness to answer Dr Phillipson's questions.

8. Counsel respectfully requests that Dr Phillipson's questions be provided as soon as is practicable.

Dated at **Lower Hutt** this 5 August 2026

Donna Hall Melody Baxter

Woodward Law

On behalf of its claimants