

**BEFORE THE WAITANGI TRIBUNAL  
WELLINGTON**

**WAI 2357  
WAI 2358**

**IN THE MATTER OF**

The Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF**

Wai 144

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**MEMORANDUM OF COUNSEL**  
**Dated: 18 May 2012**

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**Kathy Ertel & Co.**  
Barristers & Solicitors  
PO Box 27-042  
Wellington 6071  
Ph: 04-384 1148  
Fax: 04-384 1199

Counsel Acting: K Ertel

**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum is filed on behalf of Wai 144.
2. The Tribunal has directed that case studies be filed by noon 18 May 2012.
3. The case study that Wai 144 comprises the following:
  - (a) A case example of the history of lake Waikaremoana.
  - (b) *Report on the history of the title to the lake-bed of Lake Waikaremoana and Lake Waikareiti*; Emma Stevens; 1996.
  - (c) *The impact of Environmental Changes on Lake Waikaremoana & Lake Waikareiti, Te Urewera*; G Grant, R Hodge, V Wood, L Boulton; March 2004
  - (d) Lake Waikaremoana Act 1971
4. We will also be relying on the following report:
  - (a) *The Crown and Ngati Ruapani: Confiscation and Land Purchase in the Wairoa-Waikaremoana Area, 1865-187*; V O'Malley; 1994.

Dated at Wellington this 18<sup>th</sup> day of May 2012.

*Kathy Ertel,*

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Kathy Ertel  
Counsel for Wai 144