

**IN THE WAITANGI TRIBUNAL**

**WAI 2357**

**WAI 2358**

**WAI 1699**

**WAI 1701**

**IN THE MATTER OF** the Treaty of Waitangi Act 1975

**AND**

An application for an urgent hearing by  
Sir Graham Latimer, Tom Murray, Taipari  
Munroe, Kereama Pene, Rangimahuta  
Easthope, Peter Clarke, Jocelyn Rameka,  
Eugene Henare, Nuki Aldrige, Ani Martin,  
Ron Wihongi, Eric Hodge, Walter Rika,  
Emily Rameka, Maanu Paul, Charles  
White and Whatarangī Winiata

**AND**

claims by HAAMI PIRIPI on behalf of  
himself and TE RARAWA

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**MEMORANDUM OF COUNSEL**  
**18 May 2012**

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**RECEIVED**

Waitangi Tribunal

**18 May 2012**

Ministry of Justice  
WELLINGTON

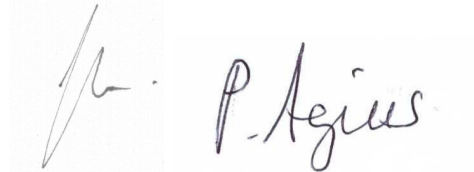
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Wellington

Solicitors Acting: Janet Mason/Priscilla Agius

## **MAY IT PLEASE THE TRIBUNAL**

- 1.** This Memorandum is filed on behalf of Haami Piripi, Chairperson of Te Runanga o Te Rarawa ("Te Runanga"), and the Iwi of Te Rarawa ("Te Rarawa") in response to directions of his Honour in Memorandum-Directions dated 27<sup>th</sup> April 2012<sup>1</sup> for claimants to file case example evidence by 12pm today. Mr Piripi is also the claimant for Wai 1699 and Wai 1701.
  
- 2.** This Memorandum attaches an Affidavit of Mr Piripi which provides evidence on two case study examples in support of the urgent application made by the New Zealand Maori Council and others in relation to the Sale of Power Generating State-Owned Enterprises Claim and the National Fresh Water and Geothermal Resources Claim ("the Wai 2357 and Wai 2358 Claims"):
  - (a)** Warawara Whenua Ngāhere I Te Taiao ("the Warawara"); and
  - (b)** Lake Tangonge.

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



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Janet Mason/Priscilla Agius  
Counsel for the Claimant

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<sup>1</sup> Wai 2357, #2.5.19, Wai 2358, #2.5.19.