**IN THE WAITANGI TRIBUNAL**

**OF NEW ZEALAND**

**WAI 2003**

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

**AND**

**IN THE MATTER OF** **Te Paparahi o Te Raki Inquiry**

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**MEMORANDUM OF COUNSEL**

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Waitangi Tribunal
*25 Jan 2013*
Ministry of Justice
WELLINGTON

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**May it please the Tribunal:**

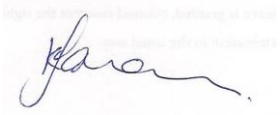
1. This memorandum is filed in response to paragraph 21 of the Memorandum Directions of His Honour Judge Coxhead dated 21 December 2012 ( Wai 1040, #2.5.145), granting leave to amalgamate Wai 2003 and Wai 528 and directing that an amended statement of claim be filed by midday today.

2. Counsel has drafted the relevant amendments incorporating the Wai 528 issues into the Wai 2003 statement of claim however further time is sought to allow the the claimants to consider the same.

3. Accordingly counsel respectfully seeks leave to file the amalgamated Wai 2003 claim by Friday 1 February 2013.

4. It is submitted that no prejudice will arise for any party should the leave sought be granted.

Dated at Kerikeri this 25th day of January 2013



Katharine Taurau
Counsel Acting