

**BEFORE THE WAITANGI TRIBUNAL  
WELLINGTON**

**WAI 2357  
WAI 2358**

**IN THE MATTER OF**

The Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF**

Te Rungana o Ngati Manawa

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**MEMORANDUM OF COUNSEL  
Dated: 13 March 2013**

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## MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed in response to the Memorandum-Directions dated 20 September 2012 (**Wai 2358, #2.5.35**). We note that parties were to indicate their intention to participate in stage two by the 30 November 2012. We apologise for the delay in filing out of time and request leave to do so. There is no prejudice to other parties in granting the leave sought.
2. This memorandum is filed on behalf of the following parties:
  - (a) Te Runanga o Ngati Manawa (“**Ngati Manawa**”);
  - (b) Wai 144 – a claim by Vernon Winitana on behalf of Ngati Ruapani (“**Ruapani**”);
  - (c) Te Atiawa Manawhenua Te Tau Ihi Trust (“**Te Atiawa**”); and
  - (d) Te Upokorehe Treaty Claims Trust (“**TUTCT**”).
3. The Supreme Court recently found that interests in water were to be found on a location-by-location basis.<sup>1</sup> Because of this finding we request that the parties we represent be given a status as parties rather than interested parties.

Dated 13 March 2013



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Kathy Ertel  
Counsel for the Parties

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<sup>1</sup> *New Zealand Maori Council and Anor v The Attorney General and Ors* [2013] NZSC 6