

**BEFORE THE WAITANGI TRIBUNAL
TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI**

**WAI 2357
WAI 2358**

IN THE MATTER of the Treaty of Waitangi Act 1975

AND

IN THE MATTER of an application for an urgent hearing by Sir
Graham Latimer and others

**MEMORANDUM ON BEHALF OF
WAIKATO-TAINUI TE KAUHANGANUI INCORPORATED**

Dated 5 April 2013

RECEIVED
Waitangi Tribunal
5 Apr 2013
Ministry of Justice WELLINGTON

Donna Flavell
Manager, Waikato-Tainui Claims and Environment Unit
Telephone: (07) 824-8689
Facsimile: (07) 824-5133
Private Bag 542
NGARUAWAHIA

MAY IT PLEASE THE TRIBUNAL:

1. This memorandum is filed in response to the Memorandum-Directions of the Presiding Officer dated 13 March 2013 (Wai 2358, doc. 2.5.36). In his Memorandum-Directions the Presiding Officer directed that parties indicate the evidence on which they propose to file in stage two of this inquiry (paragraph 11).
2. This memorandum is filed on behalf of Waikato-Tainui Te Kauhanganui Incorporated, the trustee of the Waikato Raupatu Lands Trust and the Waikato Raupatu River Trust and the mandated iwi authority for Waikato-Tainui ("**Waikato-Tainui**").
3. Waikato-Tainui wishes to reserve the right to file evidence in stage two of this inquiry. The final form of this evidence, if any, is yet to be confirmed. Any evidence on behalf of Waikato-Tainui will relate to the finalised issues for stage two of this inquiry. Waikato-Tainui also wishes to reserve the right to respond to any further evidence filed by the Crown, claimants and other parties as part of stage two of this inquiry.

DATED this 5th day of April 2013



Donna Flavell
**Manager, Waikato-Tainui Claims and
Environment Unit**