

KI MUA I TE ROOPU WHAKAMANA I TE TIRITI O WAITANGI

WAI 2358

IN THE MATTER OF

The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF

The National Freshwater and Geothermal Resources Claim

AND

IN THE MATTER OF

A Contemporary Treaty Claim to Freshwater and Geothermal Resources within their respective rohe by the iwi, hapū, whānau, marae and claimant groups of Ngāti Kahungunu

Memorandum of Counsel

Dated 8 April 2013

RECEIVED

Waitangi Tribunal

8 Apr 2013

Ministry of Justice
WELLINGTON

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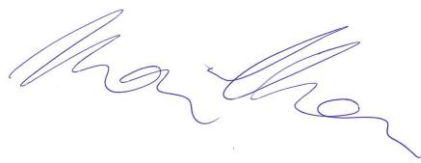
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MAY IT PLEASE THE TRIBUNAL

- 1 We act for Ngāti Kahungunu Iwi Incorporated, who represent the interests of all iwi and hapū of Ngāti Kahungunu.
- 2 This memorandum of counsel is filed in response to the Tribunal's directions requesting that parties submit a summary of evidence which they propose to file and rely on in Stage Two of this inquiry (Wai 2358, #2.5.36, paragraph 11).
- 3 Our client intends to participate in this inquiry and wishes to reserve the right to file evidence with respect to any Stage Two issues. At this point, it is difficult to confirm what the content of the Ngāti Kahungunu evidence will include as it is unclear how Stage Two of this inquiry will be structured (for example if case studies will be used) and the issues are yet to be finalised.
- 4 Counsel notes that economic and cultural reports are being prepared for Ngāti Kahungunu which may be used as evidence if required.
- 5 Ngāti Kahungunu also wishes to reserve the right to respond to any further evidence filed by the Crown, claimants and other parties in Stage Two of this inquiry.

Signed:

Mai Chen / Kiri Allan, Counsel for the Claimants

Dated: 8 April 2013

TO: The Registrar, Waitangi Tribunal
AND TO: Claimant Counsel on the Wai 2358 record of inquiry
AND TO: Treaty Team, Crown Law Office, P O Box 2858, Wellington 6140