

**IN THE WAITANGI TRIBUNAL****WAI 2358****WAI 1699****WAI 1701****WAI 996****IN THE MATTER OF  
AND**

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 and Whatarangi Winiata

**AND** claims by Haami Piripi on behalf of himself and Te Rarawa

**AND** a claim by David Potter and Andre Paterson for and on behalf of themselves and Ngati Rangitahi

**AND** a claim by Cletus Maanu Paul and Charles Muriwai White on behalf of themselves and as members of Ngai Moewhare, a marae located in the rohe of Ngati Manawa and a claimant in Te Ika Whenua inquiry

**AND** a claim by Fredrick Charles Allen for and on behalf of himself and members of Te Atiawa Iwi

**AND** a claim by Michelle Marino and Errol Churton for and on behalf of themselves and the descendants of Tāringa Kurī (Te Kaeaea)

---

**MEMORANDUM OF COUNSEL****9 April 2013**

---

Pacific Law Limited  
Barristers & Solicitors  
200 Willis Street  
PO Box 27400  
Marion Square  
Wellington 6141  
Tel: (04) 384 1304  
Fax: (04) 384 1306

**Counsel Acting:** Janet Mason /Mary Zhou**RECEIVED**

Waitangi Tribunal

**9 Apr 2013**Ministry of Justice  
WELLINGTON

## **MAY IT PLEASE THE TRIBUNAL**

- 1.** This Memorandum of Counsel (“the MoC”) is filed jointly on behalf of:
  - a.** Haami Piripi, on behalf of himself and the Iwi of Te Rarawa, (“the Wai 1699 and Wai 1701 Claimants”);
  - b.** Mr. David Potter and Mr. Andre Patterson, the claimants for Wai 996 (“the Wai 996 Claimants”);
  - c.** Cletus Maanu Paul and Charles Muriwai White as members of Ngai Moewhare, a marae located in the rohe of Ngati Manawa and a claimant in Te Ika Whenua inquiry (“the Wai 212 Claimants”);
  - d.** Fredrick Charles Allen on behalf of himself and members of Te Atiawa Iwi (“the Wai 740 Claimants”);
  - e.** Michelle Marino and Errol Churton for and on behalf of themselves and the descendants of Tāringa Kurī (Te Kaeaea) (“the Wai 377 Claimants”);

collectively referred to as “the Claimants”.


- 2.** This MoC responds to the Memorandum-Directions of W Isaac CJ (“the 13<sup>th</sup> March MD”) requesting that parties submit a summary of the evidence which they propose to file and rely on in Stage Two of this inquiry.<sup>1</sup>
- 3.** The Claimants intend to continue to participate in this inquiry. However, they cannot confirm the exact nature of any additional evidence to be filed until the issues and the inquiry process have been finalised.

---

<sup>1</sup> Wai 2358, #2.5.36, see paragraphs 10 and 11.

4. Consequently, Counsel respectfully seeks leave of the Tribunal to file the information requested at paragraphs 10 and 11 of the 13<sup>th</sup> March MD, two weeks after the Stage Two issues and the inquiry process have been finalised.

**Dated** 9 April 2013



---

Janet Mason/Mary Zhou  
Counsel for the Claimants