

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                      The Raukawa Settlement Trust

---

**Memorandum of Counsel**

Dated 8 April 2013

---

<b>RECEIVED</b> Waitangi Tribunal
<b>8 Apr 2013</b>
Ministry of Justice WELLINGTON

---

**Chen Palmer Public and Employment Law Specialists**

Barristers and Solicitors  
WELLINGTON

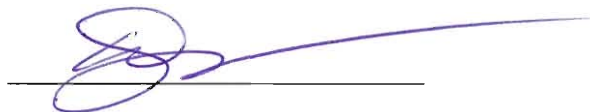
**Baden Vertongen**

Telephone: 04 499 8990  
Facsimile: 04 499 8992  
P O Box 2160, Wellington 6140  
DX SP26503  
Level 8, 138 The Terrace, Wellington

**MAY IT PLEASE THE TRIBUNAL:**

- 1 We act for the Raukawa Settlement Trust, the body mandated to negotiate the historical Treaty of Waitangi claims of Raukawa iwi, and the post settlement governance entity established to represent contemporary Raukawa interests.
- 2 This memorandum of counsel is filed in response to the Tribunal's directions requesting that parties submit a summary of the 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 reserves 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 Raukawa 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 The Raukawa Settlement Trust 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:**



Baden Vertongen, 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