IN THE WAITANGI TRIBUNAL **WAI 898**

WAI 2068

IN THE MATTER of The Treaty of Waitangi Act 1975

AND Claims in Te Rohe Pōtae District Inquiry and consolidated under Wai 898

AND the Wai 2068 claim by Harold Te Pikikotuku Maniapoto, Winston Te Winitana Maniapoto, Sonya Kararaina Parangi, Jack Tahana, and Rovina Te Kawenata Maniapoto-Anderson on behalf of themselves and Ngāti Paretekawa

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MEMORANDUM OF COUNSEL SEEKING EXTENSIONS FOR FILING OF SUBMISSIONS AND EVIDENCE DATED THE 27TH DAY OF JUNE 2013

RECEIVED
Waitangi Tribunal
27 Jun 2013
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. The Presiding Officer in his Memorandum and Directions of 22 April 2013 (#2.6.20, "the Directions") directed:

    1.1. That counsel file by midday 28 June 2013 submissions on raupatu issues (paragraphs 2.32 -2.37);

    1.2. That counsel file by midday 28 June 2013 their client's written answers to the cross-examination questions posed by the Crown (paragraph 2.29); and,

    1.3. That counsel file by 17 May 2013 any other evidence arising out of hearing four (paragraph 2.1).

2. Counsel seeks an extension to the above deadlines to midday Wednesday 3 July 2013 in relation to:

    2.1. The written cross-examination answers by Mr Maniapoto;

    2.2. The submissions on raupatu issues for the Ngati Paretekawa claimants in the Wai 2068 claim; and,

    2.3. A powerpoint presentation by Mr Maniapoto in relation to his evidence (see paragraph 2.30 of the Directions).

3. In relation to the answers to the Crown's questions referred to at paragraph 2.1 above, Mr Maniapoto, who is preparing the document, has urgently left for a whanau tangi in Taranaki and has instructed counsel to seek this extension.

4. In relation to the submissions on raupatu issues referred to at paragraph 2.2 above, counsel has completed a draft submission on raupatu issues for the claimants, but has been unable to receive instructions to file at this juncture (as the instructing client has left for the tangi). In any event, counsel notes that the opening submissions on behalf of the Ngati Paretekawa claimants (#3.4.13) covered the queries raised by the

Tribunal (at paragraph 12). Further, the evidence of Mr Maniapoto outlined the whakapapa basis for the claimants' position (#K35, paragraphs 4, 9-23) and provided a broad map of the claimant interests within the raupatu district (#K35, page 39). While counsel has no instructions to file submissions at this juncture, the opening submissions and evidence already filed set out the present position and already answer the queries raised in the Directions.

5. In relation to the powerpoint display of Mr Maniapoto referred to in paragraph 2.3 above, counsel has simply made an administrative error and has failed to complete the reference check and review of the powerpoint document provided by the client to counsel. This work was not completed and not filed through error of counsel. The references for the powerpoint are near completion and counsel expects to seek to file prior to the Wednesday 3 July 2013 extension sought.

6. Counsel has discussed this request for extensions with Crown counsel and understand there is no objection.

DATED at Auckland this 27th day of June 2013

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Dominic Wilson
Counsel for the Wai 2068 claimants