

I TE TAKE O

IN THE MATTER OF

ME
AND

TE TURE I TE TIRITI O
WAITANGI 1975

THE TREATY OF WAITANGI
ACT 1975

I TE TAKE O

IN THE MATTER OF

ME
AND

TE ROHE PŌTAE
DISTRICT INQUIRY

I TE TAKE O

IN THE MATTER OF

ME
AND

NGĀ KEREME O
HUIHANA REWA, DIANE
BRADSHAW, MIKI APITI AND
THOMAS MOKE MO OIŌROA

MEMORANDUM OF COUNSEL SEEKING LEAVE TO FILE BRIEFS OF EVIDENCE

DATED THIS 23rd DAY OF SEPTEMBER, 2013

AFEAKI CHAMBERS
BARRISTERS

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RECEIVED

Waitangi Tribunal

23 Sep 2013

Ministry of Justice
WELLINGTON

MAY IT PLEASE THE TRIBUNAL

1. Counsel respectfully seeks leave to file the Briefs of Evidence for Wai 827 claimant Ms Diane Bradshaw, and also Mr John Neal in preparation for hearing week seven of the Te Rohe Pōtae hearings.
2. Mr John Neal's Brief of Evidence concerns a report based on a commission by the Raoraokauere A3 Charitable Trust specifically in regards to the Oiōroa Block.
3. His evidence is filed on the basis that it is relevant and will assist the Tribunal in its investigation into Crown breaches alleged in the Wai 827 claim.
4. It is submitted that no prejudice will accrue to any party as a result of this late filing of Mr Neal's technical evidence, because the research matter is succinct, focused and specific to the Wai 827 claim. However, counsel submits that should any party need more time to consider this evidence, they may seek leave to cross-examine and/or file questions of clarification about Mr Neal's evidence.
5. Counsel apologises for any inconvenience caused and thanks the Tribunal in anticipation of its forbearance.

Dated at Auckland, this 23rd Day of September, 2013



Tavake Barron Afeaki
Counsel for the Claimants