

IN THE WAITANGI TRIBUNAL

WAI 2358

IN THE MATTER OF The Treaty of Waitangi Act 1975

AND A claim by the New Zealand Māori Council and
other co-claimants

AND The National Freshwater and Geothermal
Resource Inquiry

Memorandum of counsel for the NZMC and co-claimantsDated: 25 October 2013

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Waitangi Tribunal

25 Oct 2013Ministry of Justice
WELLINGTON

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May it please the Tribunal:

1. In his 25 September 2013 memorandum (Wai 2358, #2.5.43) the Presiding Officer directed the Crown and the NZMC and co-claimants to file a joint memorandum by 25 October 2013. The Crown has sought a brief extension until 29 October 2013.
2. The NZMC and co-claimants have been in ongoing discussions with the Crown. There is believed to be substantial areas of agreement. A possible joint memorandum is still being considered. If separate memoranda are filed, it is expected that the NZMC and co-claimants will reference and agree with portions of the Crown memorandum rather than duplicate any areas of agreement.
3. For these reasons, the NZMC and co-claimants also seek an extension of the deadline until 29 October 2013.

Dated: 25 October 2013



Richard Fowler / Felix Geiringer
Counsel for the NZMC and co-claimants