

IN THE WAITANGI TRIBUNAL

UNDER

The Treaty of Waitangi Act 1975

IN THE MATTER OF

The Rohe Potae Inquiry- **WAI 898**

AND IN THE MATTER OF CLAIMS BY:

Rufus Bristol on behalf of The non
sellers of the Waimarino Block-
WAI 1738

Matiu Haitana, Rangi Bristol,
Raymond Rapana, Garth Hiroti
Aiden Gilbert and Patrick Te Oro-
WAI 1388

Matiu Haitana, Henry Haitana and
Adam Haitana on behalf of Ngati
Tumanuka. - **WAI 1197**

Peture Kiwara and Chris
Ngataierua on behalf of the
descendants of Te Kere
Ngataierua - **WAI 1073**

**MEMORANDUM OF COUNSEL
DATED 15th October 2013**

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RECEIVED Waitangi Tribunal
15 Oct 2013
Ministry of Justice WELLINGTON

May it please the Tribunal:

- 1 We seek leave to question historians Heather Bassett and Richard Kay on their report- The Impact of Native Township Acts in Te Rohe Potae (#A62) on:
 - (a) The determination of title by the Native Land Court in the Pukenui block (Te Kuiti township: p 31- 32); and
 - (b) Crown purchasing in the Orahiru block (Otorohanga township: p 32- 36)
- 2 We estimate these questions will take around 10 minutes.
- 3 We seek leave to question the authors of Ngati Maniapoto Motuhake (#A110) on:
 - (a) The boundary between Maniapoto and Whanganui; (p268-273)
 - (b) The korero on the ope taua from Whanganui and the match of Hinemoana with Turanga Pito; (p364-365); and
 - (c) Wahanui's comments in 1885 to the Native Affairs Committee on the reasons for the gifting of land for the NIMT, and Rohe Potae Maori understanding of that 'takoha'. (p679-680)
4. We estimate these questions will take around 15 minutes.

DATED at Whakatane this 15th day of October 2013.

M. McGhie

Mark McGhie
Counsel