

KEI MUA I TE RŌPU WHAKAMANA I TE TIRITI  
BEFORE THE WAITANGI TRIBUNAL

WAI 898  
WAI 827

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 POTAE  
DISTRICT INQUIRY

I TE TAKE O  
IN THE MATTER OF

ME  
AND

NGĀ KEREME O  
A CLAIM BY HUIHANA  
REWA, DIANE  
BRADSHAW, MIKI APITI  
AND THOMAS MOKE

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WHAKATAKOTORANGA O NGĀ ROIA KAIKERĒME KIA TUKUNA ATU NGĀ RIPOATA O  
TE KAIKORERO  
MEMORANDUM OF COUNSEL FILING WITNESS REPORTS

TĒNEI TE RĀ 15 O WHIRINGA-Ā-NUKU, 2013  
DATED THIS 15<sup>th</sup> DAY OF OCTOBER, 2013

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<b>RECEIVED</b> Waitangi Tribunal
<b>16 Oct 2013</b>
Ministry of Justice WELLINGTON

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**WHAKATAKOTORANGA O NGĀ ROIA KAIKERĒME KIA TUKUNA ATU NGĀ  
RIPOATA O TE KAIKORERO**

**MEMORANDUM OF COUNSEL FILING WITNESS REPORTS**

**MENA KA PAI KI TE RŌPU WHAKAMANA I TE TIRITI**

**MAY IT PLEASE THE TRIBUNAL**

1. This Memorandum of Counsel is on behalf of Wai 827, a Ngāti Te Wehi claim concerning Oiōroa Wāhi Tapu brought before the Tribunal by Tūmate Mahuta (d), Lawrence Bradshaw (d), Miki Apiti, Huihana Rewa, Diane Bradshaw and Thomas Moke, evidence in support of which was presented during week 7 of the Te Rohe Potae Inquiry Stage II hearings at Waipapa Pā, Kawhia.
2. During that hearing Mr John Neal was a witness for Wai 827, wherein on Wednesday 9 October 2013, he presented a truncated version of his findings from his two research reports entitled *Raoraokauere Block and Others at Aotea Harbour (1999)*, and *Study of Oioroa Block and Surrounds (2002)*. His brief of evidence was allocated the appellation Wai 898 #N20 and his Exhibits at #N20(a).
3. Mr Neal's two reports were presented to the owners of the Raoraokauere block lands which abut onto the Oiōroa block at its northern edge.
4. Due to timetabling changes in the hearing, Mr John Neal was recalled by the Tribunal and on Friday 11 October he appeared to answer questions from Learned Crown Counsel and by the

Tribunal. Re-examination by Counsel followed and further Tribunal questions were asked. A number of issues raised therein will be followed up by Counsel for Wai 827.

5. In consequence of Judge Ambler's query seeking the two reports Mr Neal was referring to in his evidence presentation, please find **attached** as appendices to Mr Neal's Wai 898 #N20 Evidence, for filing and service the following reports by Mr John Neal:

- i. *Raoraokauere Block and Others at Aotea Harbour (1999)*; and
- ii. *Study of Oioroa Block and Surrounds (2002)*.

6. Counsel trusts that this information will be of assistance to the Tribunal in its investigations.

Kei Whangarei, tēnei te Rā 15 o Whiringa-ā-Nuku, 2013  
Dated at Whangarei, this 15<sup>th</sup> Day of October 2013



**Tavake Barron Afeaki**

Claimant Counsel for Wai 827, the Oiōroa Claim

To: The Registrar of the Waitangi Tribunal  
To: Crown Counsel – Te Rohe Pōtae District Inquiry  
To: Claimant Counsel – Te Rohe Pōtae District Inquiry