

IN THE WAITANGI TRIBUNAL

**WAI 898
WAI 1112
WAI 1113
WAI 2352**

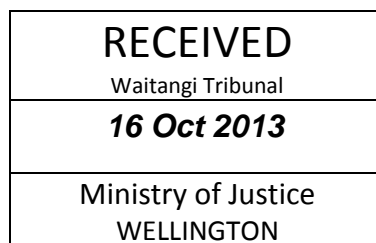
IN THE MATTER

of The Treaty of Waitangi Act 1975 (as amended)

- AND** Claims in Te Rohe Potae Inquiry consolidated under Wai 898
- AND** the Wai 1112 claim by Manihera Forbes and Mere Gilmore on behalf of themselves and Ngāti Hikairo
- AND** the Wai 1113 claim by Manihera Forbes and Mere Gilmore on behalf of themselves and Ngāti Hikairo
- AND** the Wai 2352 claim by Phillipa Barton on behalf of herself and her whānau all of Ngāti Hikairo

**MEMORANDUM OF COUNSEL FOR THE CLAIMANTS
ON CROSS-EXAMINATION AND QUESTIONS OF CLARIFICATION**

Dated the 16th day of October 2013



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MAY IT PLEASE THE TRIBUNAL

1. This memorandum sets out cross-examination indications and attaches questions of clarification for the witnesses to be heard in the eighth hearing week at Te Kotahitanga marae, Otorohanga.
2. Counsel seek leave to file this memorandum late. Quite simply, counsel had not provided a draft to clients for comment until Monday 14th October as counsel had previously been pre-occupied with the Waipapa hearing.

Cross-examination estimates

3. Counsel seek leave to cross-examine the following witnesses for the following times and on the following matters:

	Witness	Time	Matter
3.1.	Bassett and Kay, #A62	25	<ol style="list-style-type: none">1. Paretao and the Kāwhia Vigilance Committee of 1901.2. Kārewa township map ML 12756 at page 73 and the Pōhutukawa trees and Kaora Street location. The Crown's record of protection of the trees and the street (see also T Moke, #N37, paragraphs 20 and 21 and Te Maru-ō-Hikairo, #A98, pp 300-307).3. The ML 6096/2 plan that shows the Kawhia M block and the springs thereon.4. The Crown's recognition that reserves hadn't been purchased by the Crown when the Crown was looking to sell (see pages 198 and 293).

	Witness	Time	Matter
			<p>5. The return of Te Puru hospital site and the hospital buildings (see P Barton, #N4, paragraph 147);</p> <p>6. The Deed of Settlement for past rental losses 2002 (see T Moke, #N37, paragraphs 23-26).</p>
3.2.	Tauariki, Ngaia, Roa, Maniapoto-Anderson, Barrett, Douglas, Joseph, Meredith, and Wessels, #A110	5 mins	The relationship between Ngāti Maniapoto and Ngāti Hikairo

Questions of clarification

4. Counsel attaches as "Appendix A" questions of clarification for Bassett and Kay in relation to their #A62 report.

DATED at Auckland this 16th day of October 2013



Dominic Wilson

Counsel for the Wai 2352, 1112 and 1113 claimants