Appendix 1: Questions for Howard Jerry in respect of his brief of evidence

N14

1. Do you know why the survey of Awaroa A2B1 took place?

2. At para 22, you state that the cost of surveying Awaroa A2B1 – £7 18s. 9d. – "was a lot of money"?

   2.1 Would you agree that, just because £7 18s. 9d. might have been a lot of money for the individuals concerned, it was not necessarily excessive?

3. At paragraph 25, you state that you believe that the Crown used excessive survey costs to pressure your tipuna to sell their lands. In support of this statement, in footnote 12 you cite "Husbands and Mitchell, The Native Land Court, #A79, pp 243-244".

   Drs Husbands and Mitchell appear to make a general argument that survey costs often led to the alienation of land. For example, they say (at page 244):

   > Payment of survey charges of hundreds or even thousands of pounds almost inevitably entailed the large-scale alienation of land.

   3.1 However, Drs Husbands and Mitchell do not refer specifically to Awaroa A2B1? Do you agree?

   3.2 On what grounds do you say that the survey costs in this instance were excessive?

   3.3 Do you mean to say that your tipuna sold their interests in Awaroa A2B1?

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