OFFICIAL

IN THE WAITANGI TRIBUNAL

OF NEW ZEALAND

WAI 1040

WAI 700

IN THE MATTER OF	The Treaty of Waitangi Act 1975 (as amended)
AND	
IN THE MATTER OF	Te Paparahi o Te Raki District Inquiry
AND	
IN THE MATTER OF	Wai 700 the Whirinaki Maori Committee on behalf of Ngâ hāpû o Whirinaki and others

RECEIVED
Waitangi Tribunal
13 Nov 2013
Ministry of Justice
WELLINGTON

MEMORANDUM OF COUNSEL REQUESTING LEAVE TO FILE QUESTIONS IN WRITING TO P MCBURNEY

(WAI 1040 A#13)

Dated 13 November 2013 at Kaikohe NORTHLAND

CLAIMANT COUNSEL
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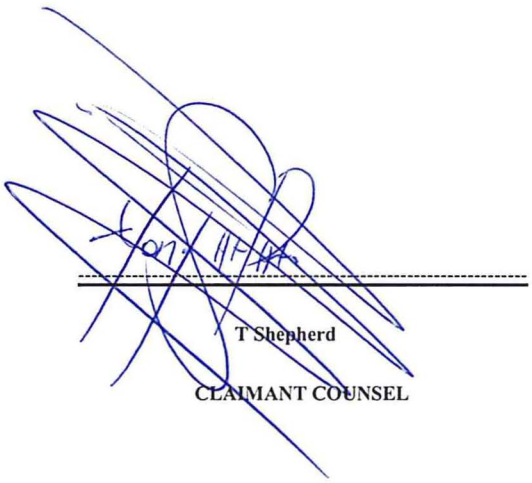
MAY IT PLEASE THE TRIBUNAL:

1. This memorandum of counsel is filed on behalf of Wai 700 the Whirinaki Maori Committee on behalf of Ngâ hãpû o Whirinaki and others.
2. Counsel seeks leave of the Tribunal to file questions in writing for Mr Peter McBurney late as counsel has been involved in fixtures since Monday 11 November 2013 in Kaikohe.
3. Due to the issue of Public Works Takings it is expected a number of counsel will wish to cross-examine this technical witness, therefore there is also a need to avoid timetable congestion where possible.
4. The questions for Mr McBurney are outlined in Appendix **'A'**.
5. Counsel apologises for the late filing and submits no prejudice will occur to parties in the late filing if leave is granted.



T Shepherd

CLAIMANT COUNSEL