OFFICIAL

In the Waitangi Tribunal

WAI 898
WAI 457
WAI 535
WAI 1469
WAI 1926

Under — the Treaty of Waitangi Act 1975

in the matter of — Wai 898, Te Rohe Potae Inquiry District

Memorandum of Counsel

Dated 11 February 2014

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Waitangi Tribunal
11 Feb 2014
Ministry of Justice
WELLINGTON

BENNION LAW

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May it please the Tribunal

1. This memorandum is filed on behalf of:

    a. Wai 457, a claim by the Tuhoro whanau; and

    b. Wai 535, a claim by Rongo Wetere and William Wetere, for and on behalf of themselves and Ngati Maniapoto; and

    c. Wai 1469, a claim by Jenny Charman and others, for and on behalf of themselves and Ngati Apakura; and

    d. Wai 1926, a claim by Harold Maniapoto and others, for and on behalf of Ngati Paretekawa.

2. Counsel seeks leave to file late a request for leave to cross-examine Dr Terry Hearn on his report "*Maori, Land, and the Crown c.1900 to c.1935*" (Wai 898, #A73).

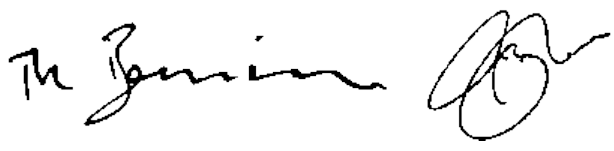
3. We estimate that 45 minutes will be required for cross-examination on the following topics:

    a. Rating, and pre-emption and restrictions on alienation; and

    b. The Native Land Commission.

4. We respectfully submit that no parties are prejudiced by the late filing of this request to cross-examine.

Dated at Wellington this 11th day of February 2014



Tom Bennion / Lisa Black

Counsel for the claimants