OFFICIAL

IN THE WAITANGI TRIBUNAL **WAI 898, 691, 788**

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF the Te Rohe Potae Inquiry District

MEMORANDUM OF COUNSEL SEEKING LEAVE TO FILE LATE

Dated this 13th day of February 2014

RECEIVED
Waitangi Tribunal
13 Feb 2014
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. This memorandum is filed on behalf of the claimants for Mokau Ki Runga – representing Wai 691 and 788.

2. It responds to the Tribunal's direction that briefs of evidence of claimants giving evidence in Hearing Week 10 be filed by 17 February 2014.

3. Due to current circumstances Counsel respectfully request an extension to this filing deadline for the following claimants:
    a. Keith Ikin
    b. Katherine Barry and
    c. Hohepa Rauputu

4. We seek this extension for several reasons.
    a. In particular the brief of evidence of Keith Ikin traverses matters that require consideration of the Oral and Traditional History Report that was released by Bruce Stirling in draft form several days ago and has yet to be finalised. Given the relevance of this research to this brief and the significant work that is being undertaken to complete this evidence we are aware that the 17 February 2014 deadline is simply not feasible.
    b. In addition with regard to Katherine and Hohepa counsel have only recently been able to obtain instructions necessary for the preparation of these briefs. This has been due to the logistics surrounding liaison with these clients for this purpose.

5. Accordingly in light of the above Counsel respectfully seek an extension to file the briefs of evidence of the above three individuals by 5 pm Monday 24 February 2013.

6. We also note that we are doing our best to file the other five briefs that are currently in process within time – but will advise early next week if required. This evidence relates to the following people:
    a. Muiora Barry
    b. Oriwia Woolf
    c. Barbara Marsh
    d. Jacob Hiriaki
    e. Hemaima Rauputu

7. We apologize for any inconvenience that this will cause and respectfully submit that no prejudice will be incurred by any party as a result of this delay.

Dated this 13th day of February 2014

Annette Sykes