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IN THE WAITANGI TRIBUNAL WAI 898

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF Te Rohe Pōtae District Inquiry

CROWN MEMORANDUM WITH QUESTIONS OF CLARIFICATION AND SEEKING LEAVE TO CROSS-EXAMINE WITNESSES IN HEARING WEEK 13

Dated 19 May 2014

RECEIVED
Waitangi Tribunal
19 May 14
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL:

Introduction

1. This memorandum responds to the Tribunal's timetabling directions that counsel file by midday on Monday 19 May 2014 questions of clarification and requests for cross-examination for hearing week 13 from 9-13 June 2014.

2. Counsel seek leave to file this memorandum late.

Questions of Clarification

3. The Crown's questions of clarification for Paul Thomas in respect of his report, "The Crown and Maori in Mokau 1840-1911" (Wai 898, A28), are attached as an appendix to this memorandum.

4. The Crown does not have questions of clarification for the other non-Crown witnesses appearing in hearing week 13.

Request for leave to cross-examine

5. The Crown seeks leave to cross-examine the following witnesses in respect of the reports they are presenting in hearing week 13 and provides estimates of time for cross-examination and an indication as to the main topics that may be covered:

Witness	Time estimate	Likely topics
H Bassett and R Kay (Wai 898, A75)	1 ½ to 2 hours	Sources and methodology. Crown acts, omissions, practices and policies covered in the report, including the broader context in which those matters occurred. Conclusions reached.
P Thomas (Wai 898, A28)	1 ½ to 2 hours	Sources and methodology. Crown acts, omissions, practices and policies covered in the report. Political engagement issues. Joshua Jones lease. Conclusions reached. Matters arising from answers to questions of clarification
J Mitchell and C Innes (Wai 898, A65)	½ hour	Sources and methodology. Crown acts, omissions, practices and policies covered

		in the report. Conclusions reached.
D Alexander (Wai 898, 148)	1 hour	Sources and methodology. Crown acts, omissions, practices and policies covered in the report. Conclusions reached.
M Cunningham M Fisher (Wai 898, A149, A150, A151 and A152)	1 hour	Sources and methodology. Crown acts, omissions, practices and policies covered in the report. Conclusions reached.

19 May 2014

Geoffrey Melvin / Liam McKay / Amy Williams
Counsel for the Crown

TO: The Registrar, Waitangi Tribunal
AND TO: Claimant Counsel