

KEI MUA TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI

Wai 2490

IN THE MATTER OF The Treaty of Waitangi Act 1975

AND

IN THE MATTER OF The Ngāpuhi Mandate Inquiry

**MEMORANDUM OF COUNSEL
7 APRIL 2015**

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MAY IT PLEASE THE TRIBUNAL

1. Counsel refer to the Tribunal's memorandum-directions of 31 March 2015 (Wai 2490, #2.7.12). Counsel file closing submissions for the Tūhoronuku Independent Mandated Authority accordingly.

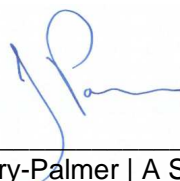
Updating the Tribunal

2. Counsel note that subsequent to the formal close of evidence there are a number of matters which have occurred, or are expected to occur shortly, which the Tribunal will presumably expect to be on the Record of Inquiry.
3. In particular:
 - (a) Tūhoronuku IMA has appointed three negotiators;
 - (b) a second round of mandated hapū kaikōrero elections will take place shortly for hapū without a kaikōrero;
 - (c) Tūhoronuku IMA's Engagement Plan is being finalised; and
 - (d) the Terms of Negotiation with the Crown is also being finalised.
4. Counsel propose filing brief additional evidence in relation to these matters as the events occur. We would not expect the evidence to be contentious.

New matters raised in March hearing

5. Counsel note that a small number of new issues were raised in the March hearing by the claimants which Tūhoronuku IMA has not had the opportunity to provide evidence in response to.
6. In particular:
 - (a) correspondence sent from Tūhoronuku IMA to Te Roroa Whatu Ora and Manawhenua Trusts regarding Maunganui Bluff;
 - (b) the suggestion that the loan facility agreement entered into by Tūhoronuku IMA and Te Rūnanga-Ā-Iwi o Ngāpuhi affects the separation between them; and
 - (c) minutes from a February 2011 meeting held at the Mid North Motel, Kaikohe.
7. Counsel considers it unlikely that these matters will be relevant to the Tribunal's findings. However, if the Tribunal considers these matters to be of relevance, Tūhoronuku IMA would expect an opportunity to provide evidence in response.

Dated 7 April 2015



J D Every-Palmer | A S Olney
Counsel for Tūhoronuku IMA

To: The Registrar of the Waitangi Tribunal