

**IN THE WAITANGI TRIBUNAL**

**Wai 2490**

**IN THE MATTER OF**                    The Treaty of Waitangi Act 1975

**AND**

**IN THE MATTER OF**                    The Ngāpuhi Mandate Inquiry

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**MEMORANDUM OF COUNSEL  
9 DECEMBER 2014**

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**MAY IT PLEASE THE TRIBUNAL****Introduction**

1. Counsel refer to the directions of Judge Reeves on 5 December 2014 regarding matters arising from the Urgent Hearing week.
2. Counsel note that written questions are to be provided to Tūhoronuku IMA witnesses by 12 December 2014, with written responses to be provided by 19 December 2014.
3. Questions were raised by counsel at the Urgent Hearing regarding the voting statistics held by Electionz.com with respect to the 2011 mandate vote. Specifically, those questions related to whether it is possible to ascertain the hapū or location of those who cast votes. Tūhoronuku IMA will liaise with Electionz.com on that matter and report to the Tribunal by 19 December 2014.
4. Lastly, Mr Sharrock was granted leave to put written questions to Mr Tau in relation to the financial performance of Te Rūnanga-ā-Iwi o Ngāpuhi. Subject to relevance and a factual basis for the questions, we would propose that they are provided by 12 December 2014 and answered by 19 December 2014.

**Dated** 9 December 2014



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

**To:** The Registrar of the Waitangi Tribunal