

## PRELIMINARY INFORMATION

### Definitions

We note that the following definitions are applied throughout this memorandum and all accompanying documentation:

1. Ngai Te Rangi and the Ngai Te Rangi Settlement Trust are referred to interchangeably as “Ngai Te Rangi”;
2. Tauranga Moana iwi, which includes Ngai Te Rangi, Ngati Pukenga and Ngati Ranginui, are referred to as “the Tauranga Moana Iwi Collective”, or where appropriate “TMIC”;
3. Hauraki iwi are referred to as “the Hauraki Iwi Collective” or “Hauraki”;
4. The Pare Hauraki Collective Redress Deed is referred to as “the Hauraki Deed” or “the Deed”;
5. The Tauranga Moana Iwi Collective Deed is referred to as “the TMIC Deed”;
6. The Ngai Te Rangi Deed of Settlement is referred to as “the NTR Deed”;
7. The Treaty of Waitangi/Te Tiriti o Waitangi is referred to as “Te Tiriti”;
8. The Tauranga Moana Framework is referred to as “the Framework”, or where appropriate, “the TMF”; and
9. The Office of Treaty Settlements is referred to as “OTS”.

### Accompanying documentation

10. This application consists of the following documents:
  - (a) Statement of Claim;
  - (b) Memorandum of Counsel;
  - (c) Brief of Evidence of Dr Hauata Palmer;
    - (i) Wai 215, #A72, Brief of Evidence of Hauata Palmer (**Appendix A**); and
    - (ii) Wai 215, #I020, Brief of Evidence of Hauata Palmer (**Appendix B**).
  - (d) Brief of Evidence of Mr Charlie Tawhiao;

- (e) Brief of Evidence of Mr Reon Tuanau;
- (f) Brief of Evidence of Ms Huhana Rolleston;
  - (i) Pare Hauraki Collective Redress Deed (**Appendix C**);
  - (ii) Redress tables (**Appendix D**);
  - (iii) Relevant Te Tiriti principles – Te Arawa report extract (**Appendix E**);
  - (iv) Crown overlapping claims policy (**Appendix F**);
  - (v) Chronology of key events (**Appendix G**);
  - (vi) Document bank (**Appendix H**);
  - (vii) Relevant articles (**Appendix I**);
  - (viii) Tauranga Moana report extracts (**Appendix J**);
  - (ix) Tauranga Moana Tribunal’s references to “rangatiratanga” and “kaitiakitanga” (**Appendix K**);
  - (x) Ngai Te Rangi Deed of Settlement (**Appendix L**);
  - (xi) Tauranga Moana Iwi Collective Deed of Settlement (**Appendix M**);
- (g) Affidavit of Mr Ngarimu Blair.