

IN THE WAITANGI TRIBUNAL**Wai 1750****I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI****Wai 339****Wai 1865****In the Matter** of the Treaty of Waitangi Act 1975**And****In the Matter** of the North-Eastern Bay of Plenty District Inquiry (Wai 1750)**And****In the Matter** of a claim by Dean Flavell and Miranda Horan on behalf of the Hiwarau C Trust (Wai 339)**And****In the Matter** of a claim by Miranda Jayne Horan and Roslyn Adair Pukepuke (Wai 1865)

MEMEORNADUM OF COUNSEL FILING QUESTIONS OF CLARIFICATION**Dated 24 October 2024**

Mahony Horner Lawyers

Counsel: Dr Bryan Gilling / Rox Soriano / Caitlin Fellowes

PO Box 24515

Wellington 6142

04 974 4028 / 04 974 4036 / 04 974 4708

bryan.gilling@mhlaw.co.nz / rox.soriano@mhlaw.co.nz /

caitlin.fellowes@mhlaw.co.nz

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Waitangi Tribunal

24 Oct 24Ministry of Justice
WELLINGTON


MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed on behalf of:
 - a. **Wai 339**, a claim by Dean Flavell and Miranda Horan on behalf of the Hiwarau C Trust; and
 - b. **Wai 1865**, a claim by Miranda Jayne Horan and Roslyn Adair Pukepuke.

(Claimants)

2. In Memorandum-Directions dated 16 August 2024, His Honour Judge Doogan, invited all parties to file questions of clarification for technical witnesses presenting at hearing 3, by 24 October 2024.¹
3. Counsel accordingly attaches questions of clarification for *Nineteenth-century Land Alienation and Administration within the North-Eastern Bay of Plenty Part One: Raupatu lands* by Jane Luiten, as **Annex A**.

Dated at Wellington this 24th day of October 2024



Dr B D Gilling, R M A Soriano and C B Fellowes
Counsel for the Claimants

¹ Wai 1750, #2.6.008; Wai 1750, #2.6.008(a).

