

**IN THE WAITANGI TRIBUNAL**

Wai 1750

**CONCERNING**

the Treaty of Waitangi Act 1975

**AND**

the North-Eastern Bay of Plenty  
District Inquiry

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**MEMORANDUM OF COUNSEL ASSIST FILING RESPONSES OF TONY WALZL  
TO QUESTIONS OF CLARIFICATION**

7 November 2024

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**Counsel Assist:**

Natalya Holmes-Mustart  
[natalya.holmes-mustart@justice.govt.nz](mailto:natalya.holmes-mustart@justice.govt.nz)

Sophie Gordon  
[sophie.gordon@justice.govt.nz](mailto:sophie.gordon@justice.govt.nz)

**MAY IT PLEASE THE TRIBUNAL**

1. This memorandum is filed by counsel assisting the Waitangi Tribunal commissioned expert witness, Tony Walzl.
2. On 16 August 2024, the Presiding Officer Judge Michael Doogan directed that any questions of clarification for hearing 3 expert witnesses of the North-Eastern Bay of Plenty District Inquiry, scheduled for 18–22 November 2024, be filed by 24 October 2024 (Wai 1750, #2.6.8 & #2.6.8(a)).
3. In this same direction, the Presiding Officer directed for responses to the questions of clarification be filed by 7 November 2024.
4. On 25 October 2024, Te Mata Law filed questions of clarification for the expert witnesses presenting at hearing 3 of this inquiry, including questions for Tony Walzl.
5. On 29 October 2024, the Crown filed questions of clarification for the expert witnesses presenting at hearing 3 of this inquiry, including questions for Tony Walzl.
6. Accordingly, this memorandum of counsel seeks to file the responses to the above questions of clarification, on behalf of Tony Walzl regarding his report 'War and Raupatu: 1840-1871' (Wai 1750, #A30).

Dated: 7<sup>th</sup> November 2024



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**Sophie Gordon / Natalya Holmes-Mustart**  
Counsel Assist

