I TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
IN THE WAITANGI TRIBUNAL

Wai 1750
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 for, and on behalf of, the descendants of the original owners of Hiwarau B1B1 and Hiwarau B1B2 (Wai 1865)

MEMORANDUM OF COUNSEL FILING BUNDLE OF DOCUMENTS FOR CROSS-EXAMINATION AT HEARING WEEK SEVEN

Dated 12 February 2026

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Waitangi Tribunal
12 Feb 26
Ministry of Justice
WELLINGTON

TĒNĀ E TE TARAIPIUNARA
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 for, and on behalf of, the descendants of the original owners of Hiwarau B1B1 and Hiwarau B1B2.

   (**Claimants**)

2. In Memorandum-Directions dated 25 September 2025, his Honour, Judge Doogan directed counsel to file bundles of documents for cross-examination at hearing week seven by 5pm, Thursday 12 February 2026.[1]

3. Accordingly, Counsel attach as '**Annex A'** the bundle of documents for the cross-examination of *Local Government and Māori Land Rating Issues Report, 1871-2021* by Suzanne Woodley, for hearing week seven.[2]

Dated at Te-Whanganui-a-Tara this 12th day of February 2026

R M A Soriano and C B Fellowes
Counsel for the Claimants

[1] Wai 1750, #2.6.43 at [2]; Wai 1750, #2.6.43 at p. 2.
[2] Suzanne Woodley (Wai 1750, #A26) *Local Government and Māori Land Rating Issues Report 1871-2021.*