BEFORE THE WAITANGI TRIBUNAL

WAI 1750
WAI 558
WAI 1775
WAI 1782

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND
IN THE MATTER OF claims relating to the North-Eastern Bay of Plenty Inquiry District **(WAI 1750)**

AND

IN THE MATTER OF a claim by the late **Hone Kameta, Te Rua Rakuraku, Paeone Goonan** and **Te Ringahuia Hata** for and on behalf of **Ngāti Ira o Waiōweka (WAI 558)**

AND

IN THE MATTER OF a claim filed by the late **John Hata** and **Russell Hollis, Antoinette Hata** and **Te Ringahuia Hata** for and on behalf of **Ngāti Patumoana hapū (WAI 1775)**

AND
IN THE MATTER OF a claim by **Te Riaki Amoamo** and **Mereaira Hata** for and on behalf of **Ngāti Ruatakenga (Wai 1782)**

MEMORANDUM OF COUNSEL
Dated this 19th day of March 2026

RECEIVED
Waitangi Tribunal
19 Mar 26
Ministry of Justice
WELLINGTON

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MAY IT PLEASE THE TRIBUNAL

1. This Memorandum of Counsel is filed for and on behalf of the following claimants:

    a) a claim by the late Hone Kameta, Te Rua Rakuraku, Paeone Goonan and Te Ringahuia Hata for and on behalf of Ngāti Ira o Waiōweka (WAI 558)

    b) a claim filed by the late John Hata and Russell Hollis, Antoinette Hata and Te Ringahuia Hata for and on behalf of Ngāti Patumoana hapū (WAI 1775)

    c) a claim by Te Riaki Amoamo and Mereaira Hata for and on behalf of Ngāti Ruatakenga (Wai 1782).

2. On 11 March 2026, His Honour Doogan J, directed counsel to file the answers in writing of Ms Suzanne Woodley and the outstanding information detailed below:

    a) Whether Ms Woodley was aware of any situations, similar to the decision to amalgamate the Hiwarau C blocks, in terms of the role of Māori versus the role of the local council in the decision;[1]

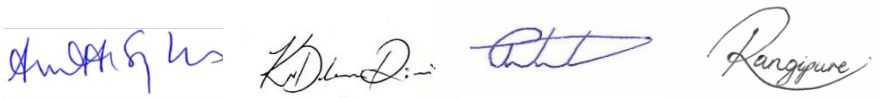
    b) The brochure that Ms Woodley referred to from the Te Puni Kōkiri website on the rating of individual houses on Māori land.[2]

3. Accordingly, counsel seeks leave to file with this memorandum, the response in writing of Ms Woodley to these matters.

[1] Wai 1750, #2.6.57 at [31].
[2] Wai 1750, #2.6.57 at [32].

4. Counsel apologise for the slight delay in filing the response and any inconvenience it may have caused.

DATED at Rotorua this 19th day of March2026



Annette Sykes	Kalei Delamere-Ririnui	Jack Potaka	Rangipurei Manley

Counsel for the Claimants