KEI MUA I TE AROARO O TE RŌPŪ WHAKAMANA I TE TIRITI O WAITANGI
BEFORE THE WAITANGI TRIBUNAL

WAI 1750
WAI 558
WAI 864

IN THE MATTER OF the Treaty of Waitangi Act 1975

AND

IN THE MATTER OF The North-Eastern Bay of Plenty District Inquiry

AND

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

AND

IN THE MATTER OF A claim by the late John Hata, Russell Hollis, and Len Brown, and by John Brown, Antoinette Hata and Te Ringahuia Hata for and on behalf of the owners of Whakapaupākihi No. 2 block concerning the Crown's acquisition of the Moutohora Quarry (**Wai 864**)

MEMORANDUM OF COUNSEL FILING WRITTEN QUESTIONS FOR TONY WALZL: WAI 1750, #A38

26 August 2026

RECEIVED
Waitangi Tribunal
27 Aug 26
Ministry of Justice
WELLINGTON

Solicitor:	**Annette Sykes**	**Counsel:**	**Jacki Cole**
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MAY IT PLEASE THE TRIBUNAL

1. Historian Tony Walzl is scheduled to present part of his *Economic Development, Social Services and Cultural Impacts Overview Report (1870 to 1930)* during hearing week 10 (24-28 August 2026).

2. Coordinating counsel has filed a draft hearing timetable for hearing week 10 and has foreshadowed an over-subscription of time estimates for questioning of Mr Walzl.[1]

3. Miss Cole has been nominated as lead counsel for questioning of Mr Walzl and has been allocated 105 minutes of questioning time.

4. Owing to the very large number of questions counsel has for Mr Walzl. and in the interests of ensuring there is sufficient time during the hearing week for all parties, including the Crown and Tribunal members, to put their questions to Mr Walzl, we seek leave to file written questions in advance of the hearing week.

5. It is not anticipated that Mr Walzl will respond to these written questions in advance of the hearing but rather will respond after the hearing, when time allows.

6. The objective in putting these written questions to Mr Walzl in advance of the hearing is to allow all other parties to consider the questions and potentially reduce their own time requirements on the basis there may be overlap or duplication of questions.

[1] Wai 1750, #3.2.457(a)

7. Leave is accordingly sought.

DATED at Rotorua and Tawa this 26th day of August 2026

Annette Sykes

Jacki Cole

Kalei Delamere-Ririnui

TO: The Registrar, Waitangi Tribunal
AND TO: Crown
AND TO: Claimant Counsel