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 POST-HEARING TEN QUESTIONS IN WRITING

Dated 8 Hepetema 2026

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Waitangi Tribunal
8 Sep 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

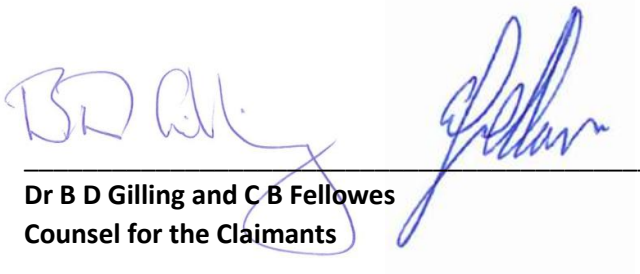
   b. **Wai 1865**, a claim by Miranda Jayne Horan and Roslyn Adair Pukepuke for, and on behalf of, the descendants of the original owners of Hiwarau B1B1 and Hiwarau B1B2.

   (**Claimants**)

2. In Memorandum-Directions dated 29 Hune 2026, his Honour, Judge Doogan, directed Counsel who were granted leave to file post-hearing ten questions in writing by 5pm Tuesday, 8 Hepetema 2026.[1] On day four of hearing ten, his Honour granted leave for Counsel to file any remaining questions in writing.

3. Appended to this Memorandum of Counsel as '**Appendix A**' are the post-hearing ten questions in writing for *Economic Development, Social Services and Cultural Impacts - Volume I (1870-1930)* by Tony Walzl.[2]

Dated at Te-Whanganui-a-Tara this 8th day of Hepetema 2026



Dr B D Gilling and C B Fellowes
Counsel for the Claimants

[1] Wai 1750, #2.6.65 at [3]; Wai 1750, #2.6.65(a).
[2] Wai 1750, #A38.