

From: IEUWA Industrial <industrial@IEUWA.org.au>
Sent: Friday, July 28, 2023 1:56 PM
To: Chambers - Hampton DP <Chambers.Hampton.DP@fwc.gov.au>
Cc: 'Dean@vicsquare.com.au' <dean@vicsquare.com.au>; Michael Jensen <Michael.Jensen@lavan.com.au>; IEU Branch Secretary <secretary@IEUWA.org.au>
Subject: B2023/703 Application by Independent Education Union of Australia (130N) - request for extension to filing deadline

Good afternoon Mr Johanson,

B2023/703 Application by Independent Education Union of Australia (130N)

I write regarding the above matter, and directions issued by the Deputy President to file a statement of agreed fact by close of business today.

To allow more time for the parties to settle a proposed statement of agreed facts, we are requesting that the Deputy President please consider granting an extension of this deadline to **close of business Tuesday 1 August 2023**.

As per **attached** correspondence, I can advise the Deputy President that representatives for both parties consent to the proposed extension.

Consideration of this request would be very much appreciated. If the Deputy President requires further information regarding this request, please do not hesitate to contact me.

Kind regards,

Mark Elliott | Deputy Secretary



**Suite 20/63 Knutsford Ave
Rivervale WA 6103**

phone: 08 9373 1000

email: melliott@ieuwa.org.au

website: ieuwa.org.au



I acknowledge the Traditional Owners and Custodians of the lands on which I live and work and pay my respect to Elders past and present. I acknowledge that sovereignty was never ceded. Always was, always will be Aboriginal land.

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Mark Elliott

From: Michael Jensen <Michael.Jensen@lavan.com.au>
Sent: Friday, 28 July 2023 10:57 AM
To: Paris Dean
Cc: Anthony Odgers; IEUWA Industrial; IEU Branch Secretary
Subject: Re: s.240 - IEU & CEWA

Thank you for your email
I have responded to Mark Elliot and confirmed we are agreeable to the proposal
Michael

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From: Paris Dean <dean@vicsquare.com.au>
Sent: Friday, July 28, 2023 10:17:15 AM
To: Michael Jensen <Michael.Jensen@lavan.com.au>
Cc: Anthony Odgers <aodgers@ieu.au>; IEUWA Industrial <industrial@IEUWA.org.au>; IEU Branch Secretary <secretary@ieuwa.org.au>
Subject: s.240 - IEU & CEWA

Dear Mr Jensen

Please find attached a proposed statement of agreed facts, provided on the basis that it is without prejudice until agreed. I understand my instructors have (or have attempted to) contact you to apologise for the lateness of its provision.

In the circumstances, and anticipating that you may need some time to obtain instructions, we would be grateful if you would confirm whether your client is amenable to our requesting that the Commission extend time to file the statement until the close of business this Tuesday, by consent.

Thanks

Paris Dean
BARRISTER

Chambers: [08 8212 7077](tel:08 8212 7077)
Mobile: [0413 523 940](tel:0413 523 940)

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Paris Dean

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