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Sent: Friday, 10 February 2023 4:35 PM

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Subject: RE: AM2020/99, AM2021/63, AM2021/65 - Aged Care Work Value [MBC-VIC.FID4764043]

Dear Associate.

We refer to paragraph [4] of the Statement and Directions dated 10 February 2023. We apologise for our slightly delayed response.

The HSU is in a similar position to the ANMF and will object to the admission of the evidence of Mr Corderoy, Mr Brockhaus, Ms Jenkins and Mr Shaw.

Given the late filing of the evidence by the Joint Employers the HSU is not currently in a position to indicate that these witnesses will not be required for cross-examination in the event that the Full Bench rules their evidence admissible as we are still considering our position in relation to crossexamination.

The HSU's current position is that each witness will be required for cross-examination. Should this position change, we will notify the Full Bench and parties.

The HSU estimates that it will require the same time for cross-examination of each witness as foreshadowed by the ANMF.

The HSU has no objection to the witnesses appearing via Microsoft Teams.

Regards

Alex

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