

From: Robert Seals [<mailto:robert@ieu.asn.au>]

Sent: Friday, 20 April 2018 11:51 AM

To: Chambers - Hatcher VP

Cc: michal.roucek@ablawyers.com.au; nigel.ward@ablawyers.com.au;

'david.carrington@mornpen.vic.gov.au'; Michael Wright

Subject: Re: Independent Education Union of Australia v Commonwealth of Australia as represented by the Department of Education and others [ABLAW-ImanageDocs.FID165140]

Associate to Vice-President Hatcher

Dear Ms Lewis,

The IEU undertakes that it will not call Mr Thomas Haines-Sutherland as a witness in this matter nor seek to enter his statement into evidence. This is done at Mr Haines-Sutherland's request. To the extent that it is possible, the IEU seeks to withdraw the statement of Mr Haines-Sutherland in accordance with his wishes.

Kind regards,

Robert Seals | Industrial Officer



Independent
Education Union
of Australia
NSW/ACT Branch



GPO Box 116
Sydney NSW 2001
The Briscoe Building
485 - 501 Wattle Street
Ultimo NSW 2007
P 02 8202 8900 | F 02 9211 1455
www.ieu.asn.au

From: Chambers - Hatcher VP <Chambers.Hatcher.VP@fwc.gov.au>

Date: Friday, 20 April 2018 at 11:42 AM

To: Robert Seals <robert@ieu.asn.au>, Michael Wright <michael@ieu.asn.au>

Cc: "michal.roucek@ablawyers.com.au" <michal.roucek@ablawyers.com.au>,
"nigel.ward@ablawyers.com.au" <nigel.ward@ablawyers.com.au>,

"david.carrington@mornpen.vic.gov.au" <david.carrington@mornpen.vic.gov.au>

Subject: FW: Independent Education Union of Australia v Commonwealth of Australia as

represented by the Department of Education and others [ABLAW-ImanageDocs.FID165140]

Dear Mr Seals,

Re: C2013/6333 – Application by IEU for an Equal Remuneration Order

I refer to the above matter and emails below.

Could the IEU please confirm as soon as practicable whether the witness statement of Thomas Haines-Sutherland is withdrawn.

Kind regards,

Ammy Lewis

Associate to Vice President Hatcher

Fair Work Commission

Tel: (02) 9308 1812

Fax: (02) 9380 6990

chambers.hatcher.vp@fwc.gov.au

Level 10 Tower Terrace

80 William Street

East Sydney NSW 2011

www.fwc.gov.au

From: Michal Roucek [<mailto:Michal.Roucek@ablawyers.com.au>]

Sent: Tuesday, 17 April 2018 6:12 PM

To: 'david.carrington@mornpen.vic.gov.au'; 'robert@ieu.asn.au'

Cc: Sophie Margaret Whish; Manroop Soin; Chambers - Hatcher VP

Subject: RE: Independent Education Union of Australia v Commonwealth of Australia as represented by the Department of Education and others [ABLAW-ImanageDocs.FID165140]

Dear Mr Carrington and Mr Seals

Thank you for your correspondence.

We will await confirmation the statement has been withdrawn by the Independent Education Union before providing our client's support for the Orders For the Production of documents to be set aside.

Yours faithfully

Michal Roucek

Senior Associate

Australian Business Lawyers & Advisors

140 Arthur Street North Sydney NSW 2060

Dir: +612 9458 7018 | Fax: +612 9954 5029 | Mob: 0407 196 970

Tel: +612 9458 7005 | Web: www.ablawyers.com.au | [in](#) [LinkedIn](#)



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From: David Carrington [<mailto:david.carrington@mornpen.vic.gov.au>]

Sent: 17/04/2018 2:40 PM

To: Sophie Margaret Whish; Manroop Soin

Cc: chambers.hatcher.vp@fwc.com.au

Subject: Independent Education Union of Australia v Commonwealth of Australia as represented by the Department of Education and others

Importance: High

Dear Sirs,

I refer to the production order served upon Mornington Peninsula Shire dated 4 April 2018 in the matter of *Independent Education Union of Australia v Commonwealth of Australia as represented by the Department of Education and others* ("the Order").

Please find attached confirmation from the Union that the witness statement of Thomas Haines-Sutherland is being withdrawn from evidence.

We propose therefore that the Order be set aside/withdrawn by agreement as a matter of urgency.

I should be grateful if you could please confirm your intention in this regard by no later than 5pm tomorrow.

Regards

David Carrington



DAVID CARRINGTON | Corporate Counsel | MORNINGTON PENINSULA SHIRE

T: 03 5950 1693 E: david.carrington@mornpen.vic.gov.au

Private Bag 1000, Rosebud VIC 3939 | 90 Besgrove Street, Rosebud VIC 3939

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