From: Madeleine Tiedeman [mailto:Madeleine.Tiedeman@Ablawyers.com.au]

Sent: Wednesday, 5 June 2019 5:08 PM

To: Chambers - Ross J; 'Natalie Dabarera 'Ruchi Bhatt''; Leigh Svendsen; 'mrobson@asu.asn.au'; 'Nicola Shaw'; 'Michael Pegg'; 'Rachel Liebhaber'; Kyle Scott; 'Toby Halls'; 'sofia.bahas@afei.org.au'; 'Lisa Doust'; 'Stephen Bull'; 'paul.musso@nds.org.au'; 'thalls@ja.com.au'; 'rachell@hsu.net.au'; 'peggms24@gmail.com'

Cc: AMOD; 'Brent.Ferguson@aigroup.com.au'

Subject: RE: AM2018/26 Social, Community, Home Care and Disability Services Industry Award 2010 – Request for extension of time [ABLAW-ImanageDocs.FID135800]

Dear Associate,

We refer to the email **below** and to the request by Ai Group for an extension to file its materials in this matter.

Our clients do not oppose the Ai Group application.

The current directions provide the union parties with 12.5 weeks to reply to the materials of the employer parties. If the Ai Group application was to be granted, that timeframe would be reduced to 8.5 weeks. In our view, a period of 8.5 weeks for filing reply materials would typically be reasonable, save for certain compelling circumstances. There is also a 3 week period between the close of reply materials and the commencement of the hearing, so it may be possible for a portion of that time period to be utilised to accommodate the Ai Group application and ameliorate the impact on the union parties.

For our clients' part, we are currently working towards meeting the deadline of 28 June 2019 for the filing of both:

- materials in support of our clients' claims; and
- materials in response to the union parties' claims.

However, we note that the time period our clients have had to date for the preparation of this material has been disrupted by work associated with the filing of submissions on issues arising from the tranche 1 hearing, as well as by dealing with issues associated with the survey. This work has taken some of the focus away from the preparation of our materials.

While our clients are working towards meeting the deadline of 28 June 2019 and are hoping to be able to meet that deadline, we wish to flag the possibility that our clients may seek a short extension to the current timeframe for the filing of its materials.

Please do not hesitate to contact us should you wish to discuss.

Yours sincerely

Madeleine Tiedeman

Associate
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