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Sent: Thursday, 21 April 2022 3:53 PM
To: Chambers - Ross J <Chambers.Ross.j@fwc.gov.au>; AMOD <AMOD@fwc.gov.au>
Cc: Alex Grayson <AGrayson@mauriceblackburn.com.au>; Ben Redford <Ben.Redford@unitedworkers.org.au>; Nigel Ward <Nigel.Ward@ablawyers.com.au>; Jordan Lombardelli <jordan.lombardelli@ablawyers.com.au>; Alana Rafter <Alana.Rafter@ablawyers.com.au>; membership@cciwa.com; Philip Gardner <pgardner@gordonlegal.com.au>
Subject: AM2020/99; AM2021/63 & AM2021/65 – Work value case – Aged Care Industry

Dear Associate

We refer to the amended directions dated 4 January 2022, statement dated 11 March 2022, statement dated 6 April 2022 and notice of listing dated 7 April 2022.

Evidence and submissions in reply

Please find attached [reply submissions of the ANMF dated 21 April 2022](#) (in PDF and Word format) and [statement of Nicholas White dated 21 April 2022](#) by way of lodgment.

Hearing plan and objections to evidence

The ANMF, HSU and UWU have prepared a proposed hearing plan which has been provided to the other parties for their consideration. The solicitors for the HSU have advised us that they will lodge that proposed hearing plan by 4pm today. Please note that, at this stage, it is anticipated that the following Melbourne based witnesses to be called by the ANMF will attend the hearing in person at the Melbourne Registry:

- Annie Butler
- Paul Gilbert
- Andrew Venosta
- Kristen Wischer

At this stage, it is anticipated that each of the other witnesses to be called by the ANMF will attend the hearing via Microsoft Teams.

While the ANMF considers that parts of the material upon which other parties propose to rely are objectionable, it does not propose to raise any formal objections to the material that has been lodged, but rather reserves its position regarding such matters for closing submissions, and will deal with these in terms of what weight, if any, these parts of the witness statements should be given.

Attendees

Please note that the following four representatives of the ANMF propose to attend the hearing in person at the Melbourne Registry:

- Jim McKenna of counsel (ph. [redacted])
- Jim Hartley of counsel (ph. [redacted])
- Kristen Wischer, ANMF (ph. [redacted])
- Nicholas White, Gordon Legal (ph. [redacted])

If you have any queries, please let us know.

Regards

Nick White

Principal Lawyer

