From: Ben Redford <Ben.Redford@unitedworkers.org.au>

Sent: Thursday, 21 April 2022 4:40 PM

To: Chambers - Ross J < Chambers.Ross.j@fwc.gov.au>; AMOD < AMOD@fwc.gov.au>

Cc: Alex Grayson < AGrayson@mauriceblackburn.com.au>; Nigel Ward

<Nigel.Ward@ablawyers.com.au>; Jordan Lombardelli <jordan.lombardelli@ablawyers.com.au>; Alana Rafter <Alana.Rafter@ablawyers.com.au>; Philip Gardner <pgardner@gordonlegal.com.au>;

Nick White <nwhite@gordonlegal.com.au>

Subject: AM2020/99; AM2021/63 & AM2021/65 – Work value case – Aged Care Industry

Dear Associate

We refer to the Commission's Directions and Statements issued in respect of this matter.

Evidence and submissions in reply

We attach the following, for filing:

- Reply Submissions of UWU
- Reply Witness Statement, Donna Capelutti
- Reply Witness Statement, Jane Wahl

Hearing plan and objections to evidence

UWU has supports a proposed hearing plan which has been provided to the other parties, and which will shortly be provided to the Commission by solicitors for the HSU.

UWU does not intend to raise any formal objections to material upon which other parties propose to reply, but we reserve our right to make submissions about such material, including with respect to what weight, if any, otherwise objectionable parts of material should be given.

Attendance at the hearing

Each of the witnesses for UWU intend to appear at the hearing via Microsoft Teams, and none of the witnesses intend to appear in person.

Each of the advocates for UWU intend to appear at the hearing via Microsoft Teams, and none intend to appear in person. Their details will be provided shortly.

Regards

Ben Redford

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