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Sent: Wednesday, 24 May 2023 3:12 PM
To: Chambers - Hatcher J[Chambers.Hatcher.J@fwc.gov.au]; Grace Morgan-Cocks[gmorgancocks@raffwu.org.au]
CC: Josh Cullinan[jcullinan@raffwu.org.au]; Amber Sharp[asharp@mccullough.com.au]; 'kanemurtagh@icloud.com'[kanemurtagh@icloud.com]; David Bliss[david@sdan.org.au]
Subject: AG2022/5615 - Application by Gusset [MCR-W.FID4282665]
Attachments: AG2022-5615 Gusset re Apple Retail EA - FURTHER AMENDED Directions 26 April 2023.pdf

Dear Associate

We refer to the Further Amended Directions issued on 26 April 2023 (**attached**), and in particular the direction that requires Apple to file and serve its material before 5.00 pm on Thursday 25 May 2023.

By consent, we seek an extension of time for Apple to file its material by 5 pm on Thursday 8 June 2023.

The background to the request is:

- (a) on 1 May 2023, Deputy President Hampton held a conference in the section 240 proceedings with selected bargaining representatives;
- (b) Commissioner Matheson was appointed to chair bargaining meetings, and chaired two days of bargaining on 16 and 17 May 2023; and
- (c) Commissioner Matheson will be chairing a further two days of bargaining on 30 and 31 May 2023.

In our view, the outcome of the additional bargaining meetings may have a material impact on the instant proceedings, and/or result in additional evidence that is relevant to place before the Commission.

We note that the requested extension does not occasion any prejudice to the Applicant, and does not interfere with the existing directions hearing date.

The Applicant has consented to this extension of time.

In seeking this extension of time, we do not seek any variation of the direction that "any party that opposes the application" is to file an outline of submissions and any evidence on which they wish to rely in response to the 225 application by 5 pm on Thursday 25 May 2023.

We look forward to your response.

The Applicant's representatives are copied to this email as are Mr Murtagh and Mr Bliss.

Kind regards,

Kerry O'Brien
Senior Associate

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