



30 August 2017

Our Ref: 20170656

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Dear Michael

C2013/6333 - APPLICATION BY IEU FOR AN EQUAL REMUNERATION ORDER

We refer to your letter of 31 July 2017 to Vice President Hatcher's Associate.

1. PROPOSED TIMETABLE

- 1.1 The timetable proposed by the Independent Education Union (**IEU**) attempts to dispose of the second tranche of the matter in very short time and does not provide sufficient time for parties opposing the making of an equal remuneration order to properly respond.
- 1.2 There are a number of reasons why the parties opposing the Application should be permitted to review and examine the material ultimately filed by the IEU before proposing a timetable for the remaining matters in this case.
- 1.3 Chief amongst these reasons is that the Application in its original form was filed by the IEU on 8 October 2013. This has allowed the Union with an unusually long period of time to develop its evidentiary case.
- 1.4 While of course we do not know the extent of the material that will be before the Commission, the length of time necessary to respond to the IEU's Application is cannot be understood until after it has been received and examined.
- 1.5 Additionally, this is the second case of its type pursuant to the *Fair Work Act 2009 (Cth)* (**FW Act**) and as such has a special status. There has been no reason advanced which would have the effect of requiring the parties opposing the Application to respond in a relatively short space of time.
- 1.6 Another matter which militates against the parties being required to respond in a short space of time is that the IEU is running a separate case to the other United Voice and the Australian

Education Union which has the effect of increasing the balance of the work required by the parties opposing the Applications.

2. PROPOSED TIMETABLE

2.1 We therefore propose the following timetable:

1. The Applicant to file and serve its evidence and any amendment to its Application on or before 6 December 2017.
2. The Parties will attend a directions hearing on [x] January 2018 to fix further dates.

If you have any questions in relation to the above please contact Michal Roucek on (02) 9458 7018.

We will file a copy of this correspondence in the Fair Work Commission.

Yours faithfully



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cc:

Associate to Vice President Hatcher

Fair Work Commission