From: Nick White <nwhite@gordonlegal.com.au> Sent: Thursday, 23 December 2021 4:08 PM

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

Cc: Jordan Lombardelli <jordan.lombardelli@ablawyers.com.au>; Nigel.Ward@ablawyers.com.au; alana.rafter@ablawyers.com.au; Alex Grayson <AGrayson@mauriceblackburn.com.au>; Penny

Parker <PParker@mauriceblackburn.com.au>; Leigh Svendsen <leighs@hsu.net.au>;

'louised@hsu.net.au' <louised@hsu.net.au>; 'Ben Redford' <Ben.Redford@unitedworkers.org.au>;

Kristen Wischer < kwischer@anmf.org.au>

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

Dear Associate

The ANMF opposes the application for an extension of time on the following bases:

- 1. No proper basis for the extension sought has been articulated.
- The Applicants and other union parties would have less than five weeks to reply to the evidence
 and submissions of the employers and employer organisations, in circumstances where our
 client does not know how many employers and employer organisations will file evidence and
 submissions in the matters.
- 3. If an application for an extension of time to file reply material is made after 11 March 2022, there is a significant risk that the listing for the hearing of evidence would also be disrupted.

Please note that our client would not oppose further amendments to the directions as follows:

- 8. Employers and employer organisations will file evidence and submissions by 4pm on Friday 18 February 2022Friday 4 March 2022.
- 9. The Applicants and other union parties will file evidence and submissions in reply by 4pm on Thursday 14 April 2022Thursday 21 April 2022.

Regards

Nick White

Senior Associate
Accredited Specialist (Workplace Relations)



Level 22, 181 William Street Melbourne VIC 3000

T: +61 (3) 9603 3035
F: +61 (3) 9603 3050
DX: 39315 Port Melbourne
E: nwhite@gordonlegal.com.au
W: www.gordonlegal.com.au

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