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Sent: Friday, 10 February 2023 2:31 PM
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Subject: AM2020/99, AM2021/63, AM2021/65 - Aged Care Work Value

Dear Associates

We refer to paragraph [4] of the Statement and Directions dated 10 February 2023.

As foreshadowed in its reply submissions of 9 February 2023 at paragraph [20], the ANMF will object to the Joint Employers' reliance on the evidence of Mr Corderoy, Mr Brockhaus, Ms Jenkins and Mr Shaw.

The ANMF is not currently in a position to indicate that these witnesses will not be required for cross-examination in the event that the Full Bench rules their evidence admissible. This matter is under current consideration. As things stand, each will be required for cross-examination. Should the ANMF's position change, we will notify the Full Bench and parties without delay.

The ANMF's estimate of the time that will be required for such cross-examination is as follows:

- Mr Corderoy – 30 minutes;
- Mr Brockhaus – 15 minutes;
- Ms Jenkins – 15 minutes; and
- Mr Shaw – 15 minutes.

The ANMF does not seek to cross-examine Professor Eager.

Regards

Nick White

Principal Lawyer

Accredited Specialist (Workplace Relations)