

**Leigh Stewart**

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**From:** Leigh Stewart [stewartl@aigroup.asn.au]  
**Sent:** Monday, 30 August 2004 2:46 PM  
**To:** Cath Bowtell  
**Subject:** RE: AIG Witnesses

Cath,

I can confirm that Ai Group is happy with the proposal outlined that we will not seek to draw any adverse inference from the fact that the ACTU has not cross examined some of the Ai Group witnesses. We also understand that the ACTU is agreeing it will not seek to draw any adverse inference from Ai Group's agreement to this arrangement.

It also needs to be clearly understood that Ai Group intends to rely upon this witness evidence and that this agreement is in no way intended to be used to make submissions that the evidence should be given any less weight by virtue of this agreement.

Regards,

Leigh Stewart  
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 Australian Industry Group  
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-----Original Message-----

**From:** Cath Bowtell [mailto:cbowtell@actu.asn.au]  
**Sent:** Monday, 30 August 2004 11:54 AM  
**To:** Leigh Stewart (E-mail)  
**Cc:** Michelle Bissett; Andrew Watson  
**Subject:** AIG Witnesses

Leigh

To confirm our telephone discussion, the ACTU will not require the following AIG witnesses for cross examination.  
 Cage, Dray, Vidler, Morgante, Rohen and Fels.

Both the AiG and the ACTU will be free to make submissions on the content of the witness statements. However the AiG will not seek to draw any adverse inference from the fact that the ACTU has not cross examined these witnesses.

Please confirm that this is an accurate record of our understanding, and that you will convey this understanding to the Full Bench at the time that you tender their statements or advise the Bench of the witness timetable.

Regards

Cath Bowtell  
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