

IN THE SUPREME COURT OF VICTORIA AT MELBOURNE

**COMMERCIAL AND EQUITY DIVISION
COMMERCIAL LIST**

No. 2115/01 F5382

BETWEEN:

**ANSETT AUSTRALIA GROUND STAFF SUPERANNUATION PLAN PTY
LTD (ACN 065 590 178) (as Trustee of the ANSETT GROUND STAFF
SUPERANNUATION PLAN) & Ors**

Plaintiffs

and

**ANSETT AUSTRALIA LTD
(ADMINISTRATORS APPOINTED) (ACN 004 209 410) & Ors**

Defendants

SLB 4

Date of Document:	6 February 2002
Filed on behalf of:	The Plaintiffs
Prepared by:	Solicitor's Code: 564
Maurice Blackburn Cashman	Tel: 9605.2700
Lawyers	DX: 466
Level 10, 456 Lonsdale Street	Ref: SLB
Melbourne Vic. 3000	

This is the document marked SLB 4 now produced and shown to Simone Louise Bingham at the time of affirming this Affidavit this 6th day of February, 2002.

Before me:

Anne Gooley

ANNE GOOLEY
of 456 Lonsdale Street, Melbourne
a natural person who is a current
practitioner within the meaning
of the Legal Practice Act, 1996.

Making the law work for you

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**Maurice
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Lawyers

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6 December 2001

Peter Cash
Deacons
Lawyers
BY FAX: 8686 6505

FAXED

Dear Practitioner,

Re: Ansett Australia Ground Staff Superannuation Plan Pty Ltd and Ors
– Federal Court Proceeding No V3075 of 2001.

Thank you for your letter of 4 December 2001.

We advise that we act for the Australian Council of Trade Unions and the following trade unions:

1. Transport Workers Union of Australia (TWU);
2. Australian Municipal, Administrative, Clerical and Services Union (ASU);
3. Communications, Electrical, Electronic, Energy, Information, Postal, Plumbing & Allied Services Union of Australia (CEPU);
4. Australian Federation of Air Pilots (AFAP);
5. Automotive, Food, Metals, Engineering, Printing and Kindred Industries Union (AMWU);
6. National Union of Workers (NUW);
7. The Australian Licensed Aircraft Engineers Association (ALAEA);
8. The Australian Workers Union (AWU);

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**Maurice
Blackburn
Cashman**
Lawyers

9. The Association of Professional Engineers, Scientists & Managers Australia (APESMA);
10. Flight Attendants Association of Australia (FAAA);
11. Ansett Pilots Association (APA); and
12. Australian Liquor, Hospitality and Miscellaneous Workers Union (LHMU).

We also act for members of the abovenamed unions who are employed by any of the companies in the document attached to this letter and marked "Schedule 1".

We believe that any suggestion of a conflict is premature. The issue raised by the Application before the Court is the proper construction of the relevant Trust Deed. Whether the resolution of that question may have different ramifications for different categories of employees is not a matter that is before the Court.

Should you have any queries please do not hesitate to contact Josh Bornstein.

Yours faithfully,



EMPLOYMENT & INDUSTRIAL LAW SECTION
MAURICE BLACKBURN CASHMAN

Kindly note that our office will close on Friday, 21 December 2001, at 1.00 p.m., and re-open on Wednesday, 2 January 2002, at 9.00 a.m.

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