



Worker Law

workerlaw.com.au | 1300 413 383

Our ref:12089493

27 November 2020

Mr Dale Blackmore
Associate
Hall Payne Lawyers
Ground Floor, 27 Peel St
South Brisbane QLD 4101
By Email: daleb@hallpayne.com.au

Dear Mr Blackmore,

1. We act for QNurses First Inc and have been instructed with relation to your letter of 24 November 2020.
2. Your client's preoccupation with our client and its officers, however flattering, is not a reason to respond to its self-created, arbitrary deadlines with ruminations about imaginary causes of action.
3. It must be very embarrassing getting such unnecessary instructions.
4. What is most striking about your client's instructions is its inability to grapple with the most basic of concepts, especially around the fundamentals of what is a trading organisation.
5. Given your client's heavy involvement in the *WorkChoices* implementation, surely one of your instructors stumbled across *E v Australian Red Cross Society* (1991) 27 FCR 310?
6. Our client's instructions are firm and clear - if your client really believes its instructions to your firm covered in your 24 November 2020 letter are anchored in actual law, and they can see an actual cause of action, they should not trouble you with instructions to write breathless letters demanding panicked deadlines.
7. Your client should file their claim in a court of competent jurisdiction, where costs follow the event for the losing party, rather than litigation by correspondence.
8. No doubt senior and junior counsel will be briefed and your client is put on notice at the first opportunity that our client will see this through and when it inevitably defends it, it will seek its costs on an indemnity basis against your client.
9. Your client is put on notice that if defending spurious QNMU tantrums are the costs of providing an alternative union to the legacy one, that is a price well worth incurring on behalf of a better choice for Queensland Nurses.



Worker Law

1300 413 383 or 07 3811 8100

listings@fairworklaw.com.au

Level 3, 97 Pirie St
Adelaide SA 5000

Level 14, 330 Collins Street
Melbourne VIC 3000

Level 12, 37 Bligh Street
Sydney NSW 2000

Level 1, 1024 Ann St
Fortitude Valley QLD 4006

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10. We are moving office next week.
11. We are authorised to accept service for any claim arising from your 24 November 2020 letter to our client, at Level 9, 388 Queen Street, Brisbane, QLD, 4000.
12. Please contact Miles Heffernan in the first instance should you wish to discuss this matter.

Regards,

Matthew Stapleton
Legal Practitioner Director
Worker Law

Regards,

Miles Heffernan
Non-Practising Director & Consultant
Worker Law

Advocate Team: +61 7 3186 0235
Email: legalteam@workerlaw.com.au



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