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Our File: 205-17-013 KM

November 1, 2018

Alberta Labour Relations Board
501, 10808 – 99 Avenue
Edmonton, AB T5K 0G5

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Attention: Tannis Brown, Director of Settlement

Dear Madam:

**Re: An application for determination brought by United Nurses of Alberta and Jessica
Wakeford affecting Alberta Health Services
Board File No. GE-07762**

We are in receipt of the Crown's letter withdrawing their intervention in this matter. We expect the withdrawal of their intervention includes the withdrawal of their submissions, and this matter is again in the position of having no one to defend the constitutionality of the exclusion of nurse practitioners from the *Labour Code*.

We request a direction from the Board confirming this understanding. We further request the Board to reconsider the previous direction that the application be bifurcated, and direct the matter to proceed as a single hearing as earlier proposed by UNA and Ms. Wakeford.

In any event, UNA is available for a case management conference call on one of November 14, 15, 26, 28, 29. UNA's availability for a hearing is for the weeks of February 25, March 4 and March 18.

For a constitutional hearing, we currently anticipate 3 witnesses who could provide their evidence in 2 days. For a determination hearing, we currently anticipate 5 witnesses who could provide their evidence in 2 days. That includes the additional proposed applicant in today's other letter, but the witnesses may change if additional nurse practitioners request to be applicants.

Thank-you.

Yours truly,

CHIVERS CARPENTER

A handwritten signature in blue ink, appearing to read 'Kristan A. McLeod', is written over the printed name and email address.

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KM/ljn

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