

Healthy Albertans.
Healthy Communities.
Together.

July 12, 2018

By facsimile: (780) 422-0970

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

Attention: Ms. Tannis Brown,
Director of Settlement

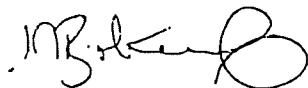
Dear Madam:

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

Further to the Board's correspondence of July 3 and 5, 2018 requesting the parties' written comments and proposals on procedure, AHS proposes that this hearing be bifurcated so that the Board proceeds with hearing and deciding upon the constitutional issue first. If the Board determines the exclusion of nurse practitioners from the Code is constitutional, there is no need to address any aspect of the determination application. If the Board determines that the exclusion of nurse practitioners from the Code is unconstitutional, the parties can proceed in a separate hearing to address the determination application.

AHS reserves the right to call evidence at any stage of these proceedings for the purposes of assisting the Board with information although will remain neutral in its position for the purposes of argument.

Yours truly,
Alberta Health Services



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MB/



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