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19 July 2010

Mr. P. Pasfield
Slater and Gordon
GPO BOX 1584
SYDNEY NSW 2001

By Facsimile: 8267 0650

WITHOUT PREJUDICE SAVE AS TO COSTS

Dear Sirs,

Re: Mr CRAIG THOMSON

We refer to our telephone conversation and your letter of 16 July 2010 and note that your client intends to resolve the matters expeditiously and without incurring unnecessary costs. As you will no doubt appreciate, our client shares that intention subject to reasonable terms being agreed to. The offer made by your client on 16 July 2010 is rejected.

The proceedings can be resolved expeditiously on the following basis, which in our view, is reasonable in all the circumstances:

1. Your client pay our client his outstanding entitlements as agreed at \$129,955;
2. Your client pay our client the sum of \$65,000 representing an amount including interest on outstanding entitlements, a contribution to this legal expenses and damages for breach of privacy, breach of employment contract, denial of natural justice and breach of confidential information for disclosing information to Fairfax.
3. In consideration of 1 and 2 above:
 - A. Proceedings numbered 27412 of 2010 be dismissed with no order as to costs;
 - B. Our client release your client from and covenants not to use it in relation to any and all claims that he asserts against it and any of its officers, employees or members connected with his employment by the Union and the matters complained about in proceedings numbered 87412 of 2010.

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4. Your client write to Fair Work Australia to advise it that the dispute between the parties has been resolved.
5. The terms of the agreement remain confidential to the parties.

Our client is willing to execute a deed of release incorporating the above terms.

This offer is open for acceptance for a period of 5 days from the date of this letter.

We look forward to your prompt response.

Yours faithfully,
KALANTZIS, Lawyers

Per: 

BILL KALANTZIS
Principal