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Court of Filing FEDERAL COURT OF AUSTRALIA (FCA)
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File Number: VID974/2024
File Title: AUSTRALIAN COMPETITION AND CONSUMER COMMISSION v
WOOLWORTHS GROUP LIMITED (ACN 000 014 675)
Registry: VICTORIA REGISTRY - FEDERAL COURT OF AUSTRALIA

Registrar

Important Information

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The date of the filing of the document is determined pursuant to the Court's Rules.

Form 59
Rule 29.02(1)


Affidavit

No VID 974 of 2024

Federal Court of Australia
District Registry: Victoria
Division: General

Australian Competition and Consumer Commission
Applicant

Woolworths Group Limited (ACN 000 014 675)
Respondent

Affidavit of: **Thomas Allen Rojas**
Address: 
Occupation: Retired
Date: 21 November 2025

Contents

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Signed 

Taken by: 

Filed on behalf of Woolworths Group Limited, the Respondent

Prepared by Peta Stevenson
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1 Farrer Place, Sydney NSW 2000, Australia
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I, THOMAS ALLEN ROJAS, of [REDACTED] retired, affirm:

- 1 I retired from Woolworths Group Limited (**Woolworths**) on 31 December 2024.
- 2 Prior to my retirement, I was a Category Manager in the Pantry Food team at Woolworths.
- 3 In this affidavit, I address the cost and retail pricing of Essentials Pasta Penne Ribbed 500g (188800-EA) (**Essentials Pasta Sample Product**) sold in Woolworths Supermarkets and Woolworths Online between September 2021 and May 2023.
- 4 In preparing this affidavit, I have been provided with a copy of the Affected Product pricing and sales data (Annexure C to the Statement of Agreed Facts filed 13 June 2025 (referred to as **Annexure C**)) and the Agreed Sample List (filed 13 June 2025).
- 5 Based on my review of those documents, I have identified that the Essentials Pasta Sample Product is referred to at item 66 of the APS and is referred to at item 5 of the Agreed Sample List.
- 6 Unless otherwise stated, this affidavit is based on my own knowledge.
- 7 Shown to me at the time of affirming this affidavit is an electronic bundle of documents marked '**Confidential Exhibit TAR-1**'. The documents are sourced from Woolworths' books and records. References to document identifier numbers in this affidavit are references to documents by that number in Confidential Exhibit TAR-1.

Role at Woolworths

- 8 I was first employed by the BIG W division of Woolworths in or about March of 2000. In October 2010, I left Woolworths and worked at Metcash as the staté Merchandise Manager for NSW. I worked at Metcash until July 2014.
- 9 After a period of self-employment, I rejoined Woolworths in March 2017 as Category Manager - Soft Drinks.
- 10 I became the Category Manager within the Woolworths' Pantry Food range in around April 2021 and held that role until I retired on 31 December 2024. In that role, I was responsible for the management of pasta, including the Essentials Pasta Sample Product.

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- 11 As a Category Manager in Pantry Food, my day-to-day duties included:
- (a) making decisions as to which products would be made available for sale (or 'ranged') at Woolworths' Supermarket stores and reviewing existing or new product offerings within the range to assess sales and profitability;
 - (b) monitoring sales and profitability of the products in my assigned categories, and determining the appropriate retail prices for those products, with the support of the Woolworths pricing team;
 - (c) deciding the short-term promotional plans and long-term price reduction programs that would apply to products in my categories;
 - (d) for third-party branded products, managing relationships with relevant suppliers;
 - (e) for Woolworths branded products (which I refer to as 'Private Label' products), including the Essentials Pasta Sample Product, liaising with Woolworths Food Company, (WFC) (being the Woolworths entity that was then responsible for sourcing Private Label products) in relation to procurement costs and ensuring that Private Label products continued to deliver value within the relevant product category; and
 - (f) reporting to the relevant Merchandise Manager in relation to the above responsibilities. For most of the Relevant Period, the Merchandise Manager I reported to was Sanjay Kapoor.
- 12 I was assisted with pasta products by Assistant Category Managers (**ACMs**) and Category Assistants (**CAs**). ACMs are responsible for tasks such as collating and submitting Prices Dropped nominations internally, coordinating removal or application of tickets, and preparing promotional plans. Over the Relevant Period, the ACMs who assisted me included Luke Breytenbach, then Alyssa Dooley.
- 13 The CAs assisted me with administrative tasks such as entering changes. Over the Relevant Period, the CA's who assisted me included Sherrie Pace, then Anna Hurley.

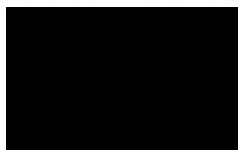
Involvement with Cost Price Increases for Private Label products

- 14 WFC was responsible for negotiating supply terms, including any cost price increases (**CPIs**), with the manufacturers of Private Label products. In doing so, WFC would often seek input from the relevant Woolworths Category Manager but Category Managers did

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not make the ultimate decision to accept or reject CPIs from manufacturers of Private Label products.

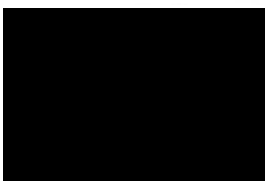
15 In my experience, the management of CPI requests in respect of Private Label products procured by WFC in the Pantry Foods portfolio involved the following steps:

- (a) first, upon being notified of a potential cost increase by a supplier, WFC would log the CPI request in a spreadsheet called the "CPI Tracker", which was circulated to Woolworths and WFC employees within the relevant portfolios.
- (b) second, WFC would verify the underlying reasons given by the supplier for the CPI request.
- (c) third, CPI requests logged on the CPI Tracker were discussed at meetings between the relevant Woolworths and WFC employees. I refer to those meetings as **Increase Meetings**. My recollection is that those meetings occurred approximately weekly, although not every outstanding CPI request was discussed at every meeting. I attended some but not all Increase Meetings. I do not generally refer to Increase Meetings in this affidavit because I do not recall which particular meetings I attended and which of the agendas and minutes I would have had access to.
- (d) fourth, for products within my categories, WFC would ask for my opinion as to whether the proposed CPI was appropriate and sustainable from Woolworths' perspective having regard to the nature of the product and the prices at which it could or would be sold in Woolworths Supermarkets. This discussion often took place at the relevant Increase Meeting.
- (e) fifth, WFC would decide upon the appropriate response to the CPI request and negotiate a resolution with the supplier.

16 Sometimes, when CPIs were commercially significant, they were added to the agenda of meetings with the relevant Commercial Director, called "COGS forums" or "HOB meetings". In this context, "HOB" stood for "Head of Business". During the Relevant Period, the relevant head of business in respect of pasta (which included the Essentials Pasta Sample Product) was the Commercial Director for Grocery, Ewan Shearer.

CPI Request Notification and Negotiations

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17 From reviewing Annexure C, I can see that the Essentials Pasta Sample Product was, between 1 January 2021 and 15 February 2022 offered to consumers at a shelf price of \$0.80. This accords with my recollection of the shelf price at the time.

18 In the second half of 2021, I became aware of the fact that there were significant price increases expected in the cost of durum wheat (the major ingredient in pasta) and that WFC was seeking approval to take steps to mitigate that risk by securing supply. I cannot recall how I first became aware of those developments.

19 On 3 November 2021, I received an email from Matthew Rolfe with a link to a draft presentation. A copy of that email is at **[MPL.0003.0036.5756] of Confidential Exhibit TAR-1**. The email states:

“Nathan has put together a HOB template for the WW & Ess pasta to get pre approval on a CPI, he is going next week there are some slides at the end for price hierarchy if you want to fill them in as part of the presentation.”

20 I understood “WW” to be a reference to “Woolworths” branded Private Label pasta and “Ess” to be a reference to “Essentials” branded Private Label pasta. These were references to the two types of Private Label pasta sold by Woolworths during the period September 2021 to May 2023. The “Woolworths” branded products comprised “Woolworths”, “Macro” and “La Molisana” and were supplied variously by Rinoldi and San Remo, or directly imported in the case of La Molisana, and the “Essentials” branded products (including the Essentials Pasta Sample Product) were supplied by Rinoldi.

21 The presentation linked to Matthew’s email is at **[MPL.0062.0005.0001] of Confidential Exhibit TAR-1**. I am identified on the front page as a presenter. The presentation states (at slide 6) that, “[m]arket expectation is that durum will land between \$ [REDACTED] ex farm for grain” and that this will drive an impact of [REDACTED] per pack for Essentials branded pasta. Page 8 of the presentation states:

“We are seeking pre-approval to proceed based on a conservative estimate of achieving average durum price of \$ [REDACTED] /mt ex farm

We will provide the business with a summary of final position secured, with expectation of CPI to impact early January 2022

If CPI will exceed \$ [REDACTED] /mt ex farm, an urgent meeting with key stakeholders (CM/MM, SSM, HOB) will be held to confirm approval to proceed. Note we

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will be operating within very short timelines and meeting may be required with 24 hours notice.

22 I responded to Matthew's email dated 3 November 2021 on the same day and asked him to confirm the date of the COGS forum. He responded, "[i]t is being nominated for HOB next thursday 11th November". A copy of these emails is at [MPL.0003.0036.5448] of Confidential Exhibit TAR-1.

23 On around 9 November 2021, I prepared a "price architecture" spreadsheet to analyse the potential impact of the foreshadowed CPI for pasta products. A copy of the spreadsheet is at [MPL.0003.0036.5994] of Confidential Exhibit TAR-1. By "price architecture", I mean an internal planning and management tool I created to map the pricing relationships across the products within the pasta range. It sets out current and proposed shelf prices, promotional price points where appropriate, and margin impacts to ensure that the pricing ladder from budget to premium products remains commercially coherent and consistent with customer expectations of pricing for budget compared to premium products. My price architecture spreadsheet modelled the expected impact of the increase in durum wheat prices on retail prices for Woolworths' Private Label pasta products assuming Woolworths maintained its gross profit (in percentage terms) on those products. That analysis is shown on the 'WW & ESS' worksheet. For the Essentials Pasta Sample Product, my analysis in sheet 3 recorded:

- (a) the existing cost to Woolworths was \$ [REDACTED] per unit (column C);
- (b) the forecast cost increase was \$ [REDACTED] (column D) or 26% (column F);
- (c) the current sell price was \$0.80 (column K), resulting in a gross profit per unit of [REDACTED] % (column M);
- (d) without an increase in the retail price, a cost price increase of that magnitude would reduce the gross profit by over two thirds to just [REDACTED] % (column O); and
- (e) assuming a \$ [REDACTED] price increase per unit, Woolworths would need to increase the retail price to \$1.00 (column Q) to achieve a similar, but smaller gross profit to the then-current gross profit [REDACTED] % vs [REDACTED] %). As the business practice at that stage was to try and maintain prices ending in "0" or "5", the required sell would be rounded down to \$1, as opposed to the pure margin maintaining price of \$1.01 (column P).

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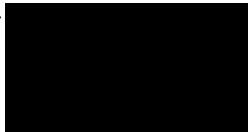
[REDACTED]

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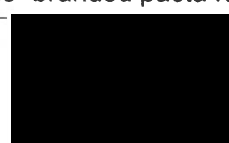
[REDACTED]

- 24 I do not have a specific recollection of attending the COGS forum on 11 November 2021, but I expect that I did attend and that a presentation was presented at the forum on or around that date by relevant team members from both WFC and Woolworths. A copy of that presentation is at **[MPL.0065.0002.0003] of Confidential Exhibit TAR-1**. I don't have a specific recollection of whether this presentation was presented at the COGS forum on 11 November 2021, but I am confident that the presentation was created for and presented at a COGS forum on or around this time because my name is on the presentation. The presentation refers to high durum wheat costs and the impact of durum wheat cost on the cost of pasta.
- 25 On 13 December 2021, I received an email from Luke Harris setting out an agenda for another COGS forum on 15 December 2021. A copy of Luke's email is at **[MPL.0003.0036.4355] of Confidential Exhibit TAR-1**. There are no pasta products listed in the agenda. I forwarded that email to Matthew Rolfe and said, "*Oils and Pasta have both fallen off of this. Are you guys aligned to this?*". Matthew's response was that he was not aware of this.
- 26 I have been shown a presentation titled, "*Grocery HOB sign off 15th December*". A copy of that presentation is at **[MPL.0069.0001.0002] of Confidential Exhibit TAR-1**. I was involved in reviewing this presentation. Pasta is addressed from page .0022 of the presentation. At page .0023, the presentation states that the key cost drivers for pasta were:
- "Durum semolina at Global record highs in cost with lowest levels of inventory - weather and COVID demand causing the impact this year, and likely to affect Australian [sic] with 50% of NSW crop destroyed by rain.*
- Ingredient durum semolina conventional impact on total cost of goods is 12% average."*
- 27 I cannot recall whether I attended the 15 December 2021 COGS forum.
- 28 On 20 January 2022, I was copied to an email from Matthew Rolfe to Sanjay Kapoor and Marnie Macauley. A copy of Matthew's email is at **[MPL.0003.0039.8115] of Confidential Exhibit TAR-1**. The email compares the cost increase requested by Rinoldi and the terms that had been offered by San Remo for the "Woolworths" and "Essentials" branded pasta products. This is because we had started to consider San Remo as a potential alternative supplier for these products. San Remo's indicative costs were lower than Rinoldi's in relation to the "Woolworths" branded pasta range, but

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higher in relation to the Essentials pasta range and the Woolworths lasagne and cous cous products. The email states that Rinoldi would resubmit the CPI request on 24 January 2022, and that *“Further next steps would be for Nathan to use the San Remo offer in the negotiation with Rinaldi [sic] as aligned with Tom”*.

- 29 On 21 January 2022, I responded to Matthew Rolfe’s email dated 20 January 2022. A copy of my email is at **[MPL.0003.0039.6657] of Confidential Exhibit TAR-1**. In this email, I stated:

“Just so that I’m clear, Rinoldi will re-submit on Monday 24th. What is the anticipated effective date they are going to ask for? Is it still 1/2?”

Has there been progress on leveraging the San Remo cost on WOW pasta to get a more reasonable price from Rinoldi?

As this seemingly needs to be finalised next week, it would be ideal to get the best possible cost from Rinoldi in the short term on the WOW pasta, and work longer term with both suppliers to get the best possible costs across the board, with a view to potentially splitting the business.

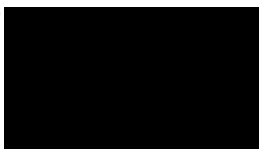
Let’s catch up next week as I see the need to go in to the COGS forum next Friday with a fairly solid and aligned plan of action.”

- 30 Later on 21 January 2022, Matthew Rolfe responded to my email. A copy of Matthew’s response is at **[MPL.0003.0039.6657] of Confidential Exhibit TAR-1**. In that email, Matthew stated:

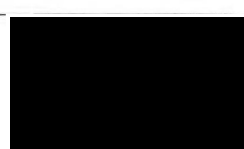
“Yes they will re-submit on Monday 24th with the anticipated effective date of the 02/02. Nathan is doing the negotiation and has the relationship with both Rinoldi and San Remo, he is off sick today and will be leveraging the San Remo cost with Rinoldi on Monday when he is back at work. Happy to catch up next week so we are aligned on a solid plan before going to HOB next Friday.”

- 31 I attended another COGS meeting on 28 January 2022. A copy of the calendar invitation I received is at **[MPL.0003.0039.7330] of Confidential Exhibit TAR-1**. The recorded attendees include all of the Category Managers for Grocery as well as Ewan Shearer. I was involved in reviewing the presentation for that meeting. A copy of the email showing that Matthew shared the presentation with me is at **[MPL.0003.0039.5344] of Confidential Exhibit TAR-1**. A copy of the presentation is at **[MPL.0069.0001.0001] of**

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Confidential Exhibit TAR-1. Slide .0007 describes the offers made by Rinoldi and San Remo as follows:

Article	Description	Current		Rinoldi		San Remo		Sales units	Total COGS Current	Rinoldi		San Remo	
		Cost	Increase	New Cost Price	Indicative Costs	Change %	Proposed COGS			Increase \$\$	Proposed COGS	Increase \$\$	
346830	WOOLWORTHS PASTA SPAGHETTI 500G					25%	2 500 000						
346831	WOOLWORTHS PASTA PENNE RIGATE 500G					25%	1 450 000						
346833	WOOLWORTHS PASTA SPIRALS 500G					25%	1 850 000						
346835	WOOLWORTHS PASTA FETTUCINI 500G					25%	1 250 000						
346837	WOOLWORTHS PASTA MACARONI 500GM					25%	1 100 000						
745386	WOOLWORTHS PASTA SHELL LARGE 500G					25%	900 000						
826485	WOOLWORTHS PASTA LONG ANGEL HAIR 500G					25%	650 000						
730276	WOOLWORTHS INSTANT LASAGNE SHEETS 250G					5%	700 000						
720060	WOOLWORTHS COUS COUS 500G					19%	270 000						
44571	Essentials Pasta Spaghetti 500g					21%	1 300 000						
188799	Essentials Pasta Spirals smal 500g					21%	1 700 000						
188800	Essentials Pasta Penne Ribbed 500g					21%	1 800 000						
Total													

First Cost Reduction: [REDACTED]

- 32 My recollection is that at this meeting, insofar as it related to the Essentials branded pasta products it was decided that Rinoldi would retain the business (that is, continue as the supplier) on the terms that Rinoldi had most recently proposed.
- 33 After the CPI had been agreed with Rinoldi, I turned my attention to the shelf and promotional pricing of the Essentials Pasta Sample Product.
- 34 Because the "Essentials" and the "Woolworths" branded pasta products were to be subject to a higher shelf price after the effective date of the price increase, they were required to be removed from any promotion so that the new shelf price could be established.
- 35 On 3 February 2022, I received an email from Matthew Rolfe listing the article numbers of all "Woolworths" and "Essentials" branded pasta products. I forwarded this list to my category assistant, Anna Hurley and asked her, "Can you get the "Low Price" and "Dropped" tickets removed from these asap?". After sending that email, I received an email from Assistant Category Manager, Luke Breytenbach, also on 3 February 2022, which was copied to Anna and stated, "Can we hold off on this ill give you a buzz in a sec." This chain of emails is at [MPL.0003.0039.4849] of Confidential Exhibit TAR-1.
- 36 After receiving Luke's email on 3 February 2022, I received a phone call from him. I recall Luke told me that certain "Woolworths" branded pasta products had been included in a print catalogue as part of a promotion and so could not be removed from their promotions until a later date.
- 37 After that phone call from Luke, also on 3 February 2022, I sent a further email to Anna, stating:

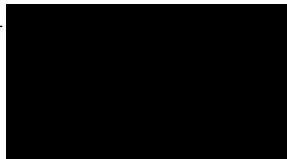
Signed: [REDACTED]

Taken by: [REDACTED]

"Thanks for the heads up Luke. Anna, Luke will give you clarity on the best dates to remove the red tickets for the two ranges. Please advise the dates back to me once determined so that I can nominate a price change date."

- 38 On 8 February 2022, I was copied to another email from Luke to Anna in which Luke confirmed that the "Essentials" branded pasta products (but not Woolworths branded pasta products which were promoted as described at paragraph 36 above) were to be removed "off dropped effective ASAP". A copy of Luke's email is at **[MPL.0003.0039.4464] of Confidential Exhibit TAR-1**. In conversations between me, Luke and Anna, we sometimes used the word "dropped" to refer to red programs, such as the "Prices Dropped" program or the "Low Price" program. I understood Luke to be asking that red tickets be removed from those items, whether those tickets related to either "Prices Dropped" or "Low Price" programs.
- 39 On 14 February 2022, I received an email from Anna confirming that the "Essentials" branded pasta products would be "removed from dropped" that day after 4pm. On 15 February 2022, I received a further email from Anna confirming that the "products are off "dropped"". I understood from Anna's email that the red tickets, being "Prices Dropped" or "Low Price" promotion tickets, had been removed from the "Essentials" branded pasta products. This chain of emails is at **[MPL.0002.0012.6934] of Confidential Exhibit TAR-1**.
- 40 On 16 February 2022, I sent an email to Matthew Rolfe and Carlo Ortolani, asking *"where do we sit with the transition plan for pasta - cost, sell, OMs, dates, comms, etc? As I recall there are a lot of dependencies involved"*. A copy of my email is at **[MPL.0002.0012.6932] of Confidential Exhibit TAR-1**. By "transition plan", I meant the plan to transition part of the "Woolworths" branded pasta products from Rinoldi to San Remo which would involve implementing changes to the cost of the products Woolworths was required to pay the supplier, as well as the plan to change the order multiples (which would impact logistical matters including shelf space). By "comms", I meant internal communications to the necessary departments to facilitate the changes that would be required as a result of the "Woolworths" and "Essentials" CPIs requested by Rinoldi and the new terms with San Remo, including in relation to the changes in order multiples and so on.
- 41 On 21 February 2022, I received a response from Matthew Rolfe to my email dated 16 February 2022 (see paragraph 40 above). A copy of Matthew's email is at **[MPL.0002.0012.6575] of Confidential Exhibit TAR-1**. In that email, Matthew stated

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that “[t]he contract price will be from 10/03, working through timelines now with Rinoldi on exact date change overs to OM of 12 per article based on production timelines and running out of current cartons of 8, indicative timelines are that the change will start from 14/03”. Matthew’s email stated that he would provide an update when he knew the change over date for each article.


42 On 11 March 2022, I sent an email to Sanjay Kapoor providing a short explanation for why pasta prices had increased, which could be used by Woolworths stores when responding to customer enquiries about the increased prices. The email attaches a document titled “Pasta 500g mapping”. A copy of that email is at [MPL.0003.0039.2933] of Confidential Exhibit TAR-1 and a copy of the attachment is at [MPL.0003.0039.2934] of Confidential Exhibit TAR-1. The email states:

“Why are Pasta prices going up so much?”

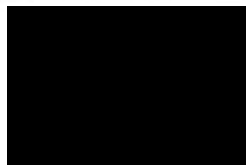
- *Durum wheat is the primary ingredient in pasta*
- *Canada is the largest global exporter of durum wheat*
- *Extreme heat and scarce rainfall in Canada and the EU have driven both a 40% decline in production volume and a reduction in quality*
- *The 2021 harvest in Canada was down from 6.5mmt to 3.1mmt, due to poor (drought) weather conditions.*
- *This has led to a major shortage in the market and concerns there will not be enough material to service demand*
- *Pasta producers are scouring the market for any available wheat. There are no other markets able to make up for the shortfall.*
- *In Australia, 50% of the NSW crop was severely affected by rain during harvest which made it unsuitable for use in the manufacture of pasta. Both Woolworths and some key suppliers use NSW-grown durum wheat as their main source of supply.*
- *Higher than expected export demand due to the global shortages has driven up prices of locally available durum, as growers took advantage of significantly higher export prices*

Unfortunately, the war in Ukraine and economic sanctions on Russia (both major global

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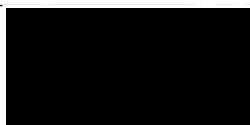
producers of wheat) will see th [sic] above dynamic persist and possibly even get worse."

- 43 I was not involved with the creation of the attachment but it was consistent with my understanding as to why pasta prices were rising, which is why I sent it to Sanjay.

Price Establishment Period and Prices Dropped Placement

- 44 From my review of Annexure C, I see that on 14 March 2022, the Essentials Pasta Sample Product price was increased from \$0.80 to \$1.00 with a white ticket applied.
- 45 Over the following approximately four weeks, I observed that neither Coles nor Aldi had increased the price point for their competing pasta products. Given the Essentials Pasta Sample Product is a pantry staple, my practice was to pay attention to Coles' and Aldi's pricing of their competing pasta products. When it became clear Coles and Aldi had not increased prices for pasta, I became concerned that the Essentials Pasta Sample Product was not priced competitively and may be negatively impacting Woolworths' market share. For this reason, I decided to reduce the price of the Essentials Sample Product to \$0.80 and place the product on the Prices Dropped program to ensure the Essentials Pasta Sample Product was priced competitively as an entry-level pantry staple.
- 46 On 28 April 2022, I was copied into an email from Luke Breytenbach to Sharon Ram requesting that 'AHOM1 500G - WW Pasta 500g' and 'AWOW5 500G - Woolworths Pasta 500g' be added to the Winter seasonal Prices Dropped program as late inclusions. AHOM1 500G - WW Pasta 500g was a reference to the Essentials pasta product family. A copy of Luke's email is at **[MPL.0002.0031.2289] of Confidential Exhibit TAR-1**. I had instructed Luke to send an email of that kind once the decision to drop the price of the Essentials pasta product family had been made.
- 47 From my review of Annexure C, I see that between 28 April 2022 and 14 June 2022, the Essentials Pasta Sample Product was placed on a Red Ticket for Prices Dropped and a Prices Dropped price of \$0.80.

Signed:



Taken by:



AFFIRMED by the deponent
at Fingal Bay
in New South Wales
on 21 November 2025
Before me:

)
)
)
)
)



Signature of deponent



Signature of witness

JAMES WILLIAM BEECHER KEEVES

Name of authorised witness (block letters)

Governor Phillip Tower, 1 Farrer Place,
Sydney NSW 2000

Address of authorised witness

Solicitor of the Supreme Court of NSW

Capacity (eg Justice of the Peace)

This document was signed in
counterpart and witnessed by
audio-visual link in accordance
with the Electronic Transactions
Act (NSW) (s 146).

Signed:



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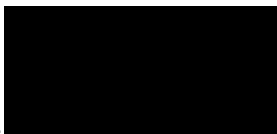
Federal Court of Australia
District Registry: Victoria
Division: General

Australian Competition and Consumer Commission
Applicant

Woolworths Group Limited (ACN 000 014 675)
Respondent

Certificate identifying Confidential Exhibit TAR-1

This is **Confidential Exhibit TAR-1** to the affidavit of **Thomas Allen Rojas** affirmed at Fingal Bay on 21 November 2025 before me at 1 Farrer Place, Sydney NSW 2000:



.....
Signature of witness

Australian Legal Practitioner