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PROCUSEMENT APPEALS

AUG 17 2011

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OFFICE OF PUBLIC ACCOUNTABILITY

PROCUREMENT APPEALS

IN THE APPEAL OF) DOCKET NO. OPA-PA 11-009
HUBTEC INTERNATIONAL CORP.,) APPELLANT'S LIST OF ISSUES)
Appellant.)

Appellant HUBTEC INTERNATIONAL CORP. ("Hubtec") hereby submits its List of Issues which require evidence or arguments to be presented at hearing.

- 1. Whether the Department of Public Works ("DPW") acted in good faith in its performance of the Contract with Hubtec.
 - 2. Whether DPW breached the Contract between the parties.
- 3. Whether DPW ignored the dangerous environmental conditions and, in effect, caused Hubtec to fail to meet its contractual obligations.
 - 4. Whether the design for the job was defective.



Ť	5. Whether DPW wrongfully terminated Hubtec from performing work under
2	the Contract.
3	6. Whether Hubtec is owed compensation for change orders, loss of time and
4	effort expended in the performance of the Contract.
5	7. Whether DPW is liable for the loss of the bonding on the job.
6	Respectfully submitted this day of August, 2011.
7	TEKER TORRES TEKER
8	Main
9	By Etally Couls
10	PHILLIP TØRRES, ESQ. Attorneys for Appellant
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