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Attorney for Appellant IP&E Holdings, LLC

THE OFFICE OF PUBLIC ACCOUNTABILITY

In the Procurement Appeal of)	PROTESTOR RESPONSE TO AGENCY REPORT
IP&E HOLDINGS, LLC.,)	Docket No. OPA-PA-14-008
Appellant.)	

Issues Presented: Whether GPA was required to make contract award based on the overall aggregate price.

Witness List:

Fred Keller and/or David Wisher.

Exhibit List:

Existing Procurement Record.

IP&E reserves the right to introduce and use any exhibit identified in the procurement record and filings filed by any party as well as any exhibit which becomes necessary and relevant for the purposes of refreshing recollection, impeachment, rebuttal, or for any other purpose during the hearing in this matter.

IP&E reserves the right to call all witnesses named in the witness list of any part and rebuttal witnesses.

Dated this 26th day of September, 2014

Steven Carrara

IP&E General Counsel

Certificate of Service

I , Steven Carrara, do herby certify that on the 26 day of September 2014, I caused to be served by email and personal delivery a copy of the IP&E Statement of Issue and Witness and Exhibit List upon the following:

Purchasing Agency:

D. Graham Botha

General Counsel

Guam Power Authority

Mobil Guam Inc.

R. Marsil Johnson

Blair Sterling Johnson & Martinez

St. Com

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