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**RECEIVED**  
OFFICE OF PUBLIC ACCOUNTABILITY  
PROCUREMENT APPEALS  
DATE: 7/2/2020  
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FILE NO OPA-PA: 19-010; 20-001

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Attorneys for Party in Interest ENGIE SOLAR

**IN THE OFFICE OF PUBLIC ACCOUNTABILITY  
PROCUREMENT APPEAL**

<b>In the Appeal of</b>	)	<b>Docket No. OPA-PA-19-010</b>
	)	<b>OPA-PA-20-001</b>
<b>GlidePath Marianas Operations,</b>	)	
<b>Inc.</b>	)	<b>DECLARATION OF ANITA P. ARRIOLA</b>
	)	<b>IN SUPPORT OF INTERESTED PARTY</b>
<b>Appellant.</b>	)	<b>ENGIE SOLAR'S OBJECTIONS AND</b>
	)	<b>MOTION TO STRIKE APPELLANT'S</b>
	)	<b>AMENDED WITNESS LIST</b>

ANITA P. ARRIOLA declares:

1. I am one of the attorneys for ENGIE Solar in the above-captioned matter. I make this Declaration in support of ENGIE Solar's Objections and Motion to Strike Appellant's Amended Witness List. I have personal knowledge of the facts contained herein and if called as a witness I would and could testify competently thereto.

2. The parties have had two logistics meetings at Suite 907, the site of the evidentiary hearing of this matter. The meetings occurred on June 24, 2020 at 2:00 p.m. and July 1, 2020 at 2:00 p.m. GlidePath's attorneys were present at both logistics meetings. At no time during the logistic meetings did GlidePath's attorneys suggest or indicate that they would be calling a second expert witness. Further, at no time during those logistic meetings did they mention that they would be adding another person on their witness list or that they would be filing an Amended Witness List.

3. On July 2, 2020, I received an « Amended Appellant's Witness List » at 11:00 a.m.

4. In a telephone conversation with Joseph Razzano, counsel for Appellant GlidePath Marianas Operations, Inc. on July 2, 2020, I asked who Robert P. Charles is, the new person listed in the Appellant's Amended Witness List. Mr. Razzano informed me that Mr. Charles is GlidePath's second expert witness, he works at Sargent & Lundy, L.L.C., the same firm where their other expert witness Vince Maione works, and « he will talk about the same thing Vince Maione will testify about. »

5. I received a copy of Robert P. Charles' resume at 2 :45 p.m. on July 2, 2020.

6. GlidePath's Amended Witness List and their addition of a second expert witness is extremely detrimental to ENGIE Solar. We have planned our case presentation, our exhibits, and our witnesses around the original Witness List filed by GlidePath on March 13, 2020. To add another expert witness at this late date, on the eve of a holiday and weekend just before the hearing date is not only in violation of the Public Auditor's Scheduling Order, it is also extremely disruptive. We do not know what he will testify about, we do not know how to counter his testimony, and we do not know what he intends to say at the hearing. ENGIE Solar does not have any time or ability to research this expert witness's credentials or to determine if it is necessary to retain another expert witness to counter Mr. Charles' testimony.

I declare under penalty of perjury under the laws of Guam that the foregoing is true and correct.

Dated at Hagåtña, Guam: July 2, 2020.

**ARRIOLA LAW FIRM**  
Counsel for Interested Party  
ENGIE SOLAR

By:   
ANITA P. ARRIOLA