

1 Jacqueline Taitano Terlaje, Esq.
2 **LAW OFFICE OF JACQUELINE TAITANO TERLAJE, P.C.**
3 250 Route 4
4 Suite 204, Nanbo Guahan 250 Building
5 Hagåtña, Guam 96910
6 Telephone 671.648.9001
7 Facsimile 671.648.9002
8 Email: info@terlajelaw.com

9 Attorneys for Petitioner
10 *Data Management Resources, LLC.*

OFFICE OF PUBLIC ACCOUNTABILITY
GUAM

Aug 07, 2012

TWO 1:20pm 7-6
FILE NO. 12-007

11 **THE OFFICE OF PUBLIC ACCOUNTABILITY – GUAM**
12 **HAGÁTÑA, GUAM**

13 In the Appeal of) DOCKET NUMBER. **OPA-PA-12-007**

14 DATA MANAGEMENT RESOURCES, LLC,)

15 Appellant.)

16 **STIPULATION AND REQUEST
17 TO ENLARGE TIME FOR HEARING**

18 COMES NOW Appellant, DATA MANAGEMENT RESOURCES, LLC. (“DMR”) through
19 undersigned counsel, and the Government of Guam through the Office of the Attorney General of Guam
20 and stipulate and agree to Enlarge Time for Hearing from August 13 and 14, 2012 as set forth in the
21 Scheduling Order received on August 6, 2012. The Public Auditor previously granted the Appellant’s
22 motion to take discovery depositions in this matter for which transcripts of all depositions will not be
23 available until September 3, 2012. A true and correct copy of the correspondence from Isa
24 Administrative Services is attached hereto as Exhibit 1 for reference. The Parties respectfully request
25 that the Public Auditor set this matter for hearing on or after October 2, 2012 for merits hearing so that
26 the parties have ample opportunity to review the transcripts.
27
28

ORIGINAL

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28


RESPECTFULLY SUBMITTED on this 6th day of August, 2012.

**LAW OFFICE OF
JACQUELINE TAITANO TERLAJE, P.C.**

**OFFICE OF THE ATTORNEY
GENERAL**

By: 

JACQUELINE TAITANO TERLAJE
Attorney for Appellant

By: 

BENJAMIN ABRAMS
Deputy Attorney General

ISA ADMINISTRATIVE SERVICE

P.O.Box 1119, Hagåtña, Guam 96932

Phone: 486-0110

July 24, 2012

Ms. Jacqueline Taitano Terlaje
LAW OFFICE OF JACQUELINE TAITANO TERLAJE, P.C.
250 Route 4
Suite 204, Nanbo Guahan 250 Building
Hagåtña, Guam 96910

Mr. Benjamin Abrams
Assistant Attorney General
OFFICE OF THE ATTORNEY GENERAL
287 West O'Brien Drive
Hagåtña, Guam 96910

SUBJECT: DEPOSITION TRANSCRIPTS
OPA-PA-12-007, Data Management Resources LLC.

Hafa Adai, Ms. Terlaje and Mr. Abrams.

Counting today's depositions, we will have recorded seven depositions in the above referenced protest appeal, every one of which have been a full day, condensed into no less than five hours of recording per deposition. Each hour of recording translates into, minimally, an hour-and-a-half of transcribing. In most depositions, the standard is a thirty-day turnaround for a transcript. In this case, we will be compressing almost seven months' of work into one month.

Recognizing that there is a hearing in the matter on August 13, 2012, and given the review time needed by the attorneys, we would respectfully request an extension of time in which to produce the transcripts up to and including September 3, 2012. In the interest of convenience to the noticing party, Ms. Terlaje, each transcript will be submitted as they are made available, up to and including September 3rd.

Thank you for your professional courtesy with regard to this request.

Si Yu'os Ma'ase,


Priscilla Castro Torres
Owner

EXHIBIT 1

ISA