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

In the Matter of)	
)	
IP&E HOLDINGS, LLC.,)	
)	
Appellant,)	
And)	INTERESTED PARTY
)	MOBIL OIL GUAM INC.'S
GUAM POWER AUTHORITY,)	LIST OF ISSUES
)	
Purchasing Agency.)	
)	

Interested Party Mobil Oil Guam Inc. ("Mobil"), hereby submits its List of Issues remaining to be determined at the hearing in the above-captioned procurement appeal:

1. Whether parties bidding on the multi-step bid identified as GPA-005-15 were required to submit insurance policies at the time of the IFB submission.

DATED this 4th day of August, 2015.

BLAIR STERLING JOHNSON & MARTINEZ
A PROFESSIONAL CORPORATION

BY: 
R. MARSIL JOHNSON
Attorneys for Party in Interest Mobil Oil Guam Inc.

CERTIFICATE OF SERVICE

I, R. Marsil Johnson, do hereby certify that on the 4th day of August 2015, I caused to be served a copy of **INTERESTED PARTY MOBIL OIL GUAM INC.'S LIST OF ISSUES** to be served upon the following, via hand delivery:

Purchasing Agency: D. Graham Botha
GPA Legal Counsel
1911 Army Drive, Suite 227
Harmon, Guam, 96913

Appellant: Steven Carrara
IP&E Holdings, LLC
646 Chalan San Antonio
Tamuning, Guam 96913-3644

DATED this 4th day of August, 2015.

BLAIR STERLING JOHNSON & MARTINEZ
A PROFESSIONAL CORPORATION

BY: 
R. MARSIL JOHNSON
Attorneys for Party in Interest Mobil Oil Guam Inc.

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