



1 2008 Notice of Appeal. Section 12105(g) requires that the Agency Report include a  
2 statement addressing each of the allegations raised by Appellant. Appellee UOG's  
3 April 23, 2008 untimely filing fails to provide responses to Appellant GCM's  
4 allegations as contained in its April 15, 2008 Notice of Appeal.

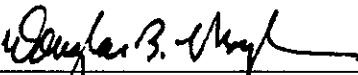
5 3. On May 30, 2008 Appellee filed an "Agency Report" indicating that  
6 it was voiding its cancellation of Bid No. P11-08. Since that time the parties are  
7 attempting to negotiate a contract.

8 4. Appellant has incurred attorneys fees and costs in the approximate  
9 amount of \$5,629.57 prior to this submission, and been prejudiced by Appellee  
10 UOG's improper action in canceling the bid, and now voiding the cancellation of  
11 bid. Appellant GCM should justly be placed in a position had it not had the bid  
12 cancelled, and the attorneys fees awarded in the event that the parties are unable  
13 to finalize a contract based upon Appellee UOG's bid offering.

14 5. If this case is dismissed, and Appellee UOG and Appellant GCM is  
15 not able to agree upon a contract, Appellant GCM respectfully requests that the  
16 cancellation be without prejudice to its right to appeal Appellee UOG's refusal to  
17 award the bid to Appellant GCM and entering into a contract based upon the bid  
18 offering and Guam law.

19 Respectfully submitted this 28<sup>th</sup> day of May, 2008.

20  
21 *Douglas B. Moylan*  
22 *Attorney at Law*

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24   
25 **Douglas B. Moylan**

# **Exhibit A**



# **Exhibit B**



UNIVERSITY of GUAM  
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Office of the President  
Legal Counsel

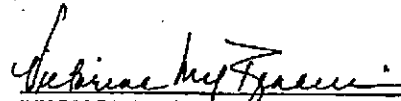
OFFICE OF THE PUBLIC AUDITOR  
PROCUREMENT APPEAL

In the Appeal of )  
 )  
GUAM CLEANING MASTERS, )  
 )  
Appellant. )  
 )  
\_\_\_\_\_ )

CASE NO: OPA-PA 08-005

The UNIVERSITY OF GUAM ("University"), by and through its legal counsel,  
VICTORINA M.Y. RENACIA, hereby files the Procurement Record relevant to the  
above-captioned appeal, pursuant to 2 GAR § 12104 (c) (3).

Dated: 13 April 2008

  
\_\_\_\_\_  
VICTORINA M.Y. RENACIA  
University Legal Counsel

  
*Douglas B. Moylan*  
ATTORNEY AT LAW

Received: 1:03pm; 4/23/08, Gu