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

10
11 In the Appeal of

12
13 Core Tech International Corp.,

14
15 Appellant.
16
17

DOCKET NO. OPA-PA-17-001

**OPPOSITION TO DPW'S MOTION TO
DISMISS; JOINDER IN DPW'S MOTION
FOR EXPEDITED DECISION**

18
19 Appellant Core Tech International Corp. ("Core Tech") hereby opposes Department of Public
20 Works' ("DPW") Motion to Dismiss and joins in DPW's Motion for Expedited Decision in this
21 matter, both filed on March 31, 2017.

22 In its Motion to Dismiss, DPW claims that there is no remaining dispute in this Appeal
23 because it has conceded in its Agency Report that DPW will limit the RFP to the services and work
24 relating to the Simon Sanchez High School Project and to the preparation of the CCIP. *See, Motion*
25 *to Dismiss* at 2. Core Tech disagrees with DPW on this point: DPW's concession in its Agency
26 Report does not resolve all of the issues.

27 As discussed in Core Tech's Response to Agency Report filed concurrently, a full resolution
28 of Core Tech's appeal requires a determination by the Public Auditor that:

1 1. The procurement of insurance and maintenance of the remaining 34 schools is not
2 authorized under Chapter 58E. The current RFP should not include procurement of services and
3 work for 5 GCA Chapter 58E, and cannot be used to expand the services and work authorized.

4 2. Chapter 58E103 requires the Program Study to be completed at least 30 days before
5 the issuance of the RFP for procurement of work and services for the 34 remaining schools.

6 Core Tech joins in DPW's request for an expedited decision.

7 *Respectfully submitted* this 10th day of April, 2017.

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9 **CIVILLE & TANG, PLLC**

10
11 By: _____

JOYCE C.H. TANG

Attorneys for Appellant

Core Tech International Corp.