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PROCUREMENT APPEALS

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FILE NO OPA-PA: 19-011 / 20-003

5 *Attorney for Interested Party*
6 *SH Enterprises, Inc.*

7 **BEFORE THE PUBLIC AUDITOR**
8 **PROCUREMENT APPEALS**

9 IN THE APPEAL OF:

10 BASIL FOOD INDUSTRIAL SERVICES
11 CORPORATION,

12 Appellant.

) DOCKET NO. OPA-PA-19-011
OPA-PA-20-003

**SH ENTERPRISES, INC.'S
LIST OF ISSUES**

13 COMES NOW, Interested Party SH Enterprises, Inc. ("SH Enterprises"), by and through
14 the undersigned counsel, hereby submits its List of Issues to be determined at the August 11, 2020
15 hearing on this matter:

- 16 1. Whether Basil's November 22, 2019 protest to the April 2019 Emergency
17 Procurement is untimely.
- 18 2. Whether Basil's November 22, 2029 protest to GSA Bid No. GSA0-056-19 is
19 untimely because Basil knew of SH's withdrawal or alleged "termination" on April 3, 2019 more
20 than 14 days before filing its protest on November 22, 2019.
- 21 3. Whether the alleged breach of another's contract is grounds to protest to the Chief
22 Procurement Officer pursuant to 5 GCA § 5425.

23 Respectfully submitted this 31st day of July, 2020.

24 **LAW OFFICE OF VANESSA L. WILLIAMS, P.C.**
25 *Attorney for Interest Party*
26 *SH Enterprises, Inc.*

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28 _____
VANESSA L. WILLIAMS, ESQ.