



Jerrick Hernandez <jhernandez@guamopa.com>

OPA-PA-24-001, In the Matter of the Appeal of Morrico Equipment, LLC

Camarine Hopkins <camarine@camachotaitano.law>
To: Jerrick Hernandez <jhernandez@guamopa.com>

Fri, Jul 19, 2024 at 1:47 PM

Hafa Adai Jerrick,

Camacho & Taitano LLP through Shannon Taitano, Esq., co-counsel for Guam Solid Waste Authority hereby submits this email filing regarding the above subject procurement appeal. This email consists of four (4) attachments, as follows:

- Guam Solid Waste Authority's Witness List (**1 page**)
- Guam Solid Waste Authority's Exhibit List (**224 pages**)
- Guam Solid Waste Authority's List of Issues (**2 pages**)
- Guam Solid Waste Authority's Admission of Facts (**2 pages**)

Please let me know if you have any questions or issues with viewing or downloading the attachments.

Thank you,
Camarine

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4 attachments

- 2024.07.19 Witness List.pdf**
99K
- 2024.07.19 List of Issues.pdf**
100K
- 2024.07.19 Admission of Facts.pdf**
102K

 **2024.07.19 Exhibit List .pdf**
10893K

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6
7 Co-counsel for Purchasing Agency *Guam Solid Waste Authority*

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

12	IN THE APPEAL OF:)	Docket No. OPA-PA-24-001
13)	
14	MORRICO EQUIPMENT, LLC,)	
15)	GUAM SOLID WASTE
16	Appellant,)	AUTHORITY'S LIST OF ISSUES
17)	
18	vs.)	
19)	
20	GUAM SOLID WASTE AUTHORITY,)	
21)	
22	Purchasing Agency.)	
23)	

24 **COMES NOW**, Guam Solid Waste Authority, by and through its co-counsel,
25 Shannon Taitano, Esq., and hereby submits the following list of issues:

- 26 1. Whether Morrico's December 27, 2023 protest that the IFB used John Deere specifications in a restrictive manner was untimely because Morrico knew that John Deere was used to form the basis of some of the specifications on November 15, 2023 and responses to Morrico's questions about the specifications, marked received on November 23, 2023, and the resulting amendment to the specifications was sent to Morrico on November 20, 2023.
2. Whether the procurement of the compact wheel loader was not unduly restrictive since Far East Equipment's product was sourced from different companies, including John Deere, to customize a product that met the

1 specifications, and Morrico's product significantly deviated from the
2 specifications.

3 Dated this 19th day of July 2024.

4 **CAMACHO & TAITANO LLP**
5 Co-counsel for Purchasing Agency

6 By: 
7 **SHANNON TAITANO**

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