

1 **FISHER & ASSOCIATES**  
2 *Thomas J. Fisher, Esq.*  
3 Suite 101 De La Corte Building  
4 167 East Marine Corps Drive  
5 Hagåtña, Guam 96910  
6 Telephone: (671) 472-1131  
7 Facsimile: (671) 472-2886

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9 **BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY**  
10 **HAGÁTÑA, GUAM**

11 IN THE MATTER OF K CLEANING ) OPA-PA-13-004  
12 SERVICES )  
13 )  
14 APPELLANT )  
15 ) **AGENCY'S SECOND**  
16 ) **HEARING BRIEF**  
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22 **COMES NOW** the Guam International Airport Authority (Agency), by and through Counsel  
23 Fisher & Associates, and submits a Hearing Brief pursuant to the Office of Public  
24 Accountability's Order of \_\_\_\_\_ 2013.

25 **ISSUES PRESENTED**

Whether Agency Properly Rejected Appellant's Bid

Appellant failed to timely submit his bid to the Agency. As a result, and pursuant to the solicitation, his bid was rejected and cannot be considered for award.

**ANTICIPATED WITNESSES**

1. Mr. Frank P. Taitano. Mr. Taitano will testify, *inter alia*, as to the Agency's procedure when receiving bids, how the Agency conducted a solicitation and received the bids involved in this protest and why Appellant's bid was not accepted.

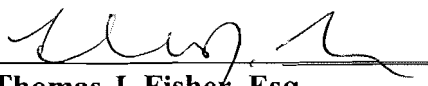
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2. Mr. Dubidato Conlu. Mr. Conlu is expected to testify that he attended a pre-bid conference where he was told to submit his bid to the Agency's Executive Manager's office. He is expected to testify that he did not do so and as a result his bid was late.

**PROPOSED EXHIBITS**

All exhibits which may be used by Agency have been submitted in either the Agency Report, the Procurement Record, or are otherwise part of the record.

**FISHER & ASSOCIATES**

  
**Thomas J. Fisher, Esq.**  
**For Guam International Airport Authority**