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Attorneys for: Real Party in Interest TeleGuam Holdings LLC

OFFICE OF PUBLIC ACCOUNTABILITY

IN THE APPEAL OF) DOCKET NO. OPA-PA10-005
)
PACIFIC DATA SYSTEMS, INC.,)
)
Appellant.)
_____)

**REAL PARTY IN INTEREST TELEGUAM HOLDINGS LLC'S
RESPONSE TO APPELLANT'S SUPPLEMENTAL BRIEF**

Real Party In Interest, TeleGuam Holdings, LLC (hereafter referred to as "GTA"), by its counsel of record, Cunliffe & Cook, A Professional Corporation, through Jeffrey A. Cook, Esq., hereby responds to Appellant Pacific Data Systems, Inc.'s (hereafter referred to as "PDS") Supplemental Brief filed December 2, 2010, as follows.

The Declaration of John Day, President of PDS, is wrong. Shamrock TeleGuam Holdings, LLC is a Delaware limited liability company. See, Declaration of John Brady filed herewith.

The ownership interests of the various intertwined companies that make up GTA are as follows:

(a) Shamrock Capital Advisors owns 66.66% of Shamrock TeleGuam Holdings, LLC, a Delaware limited liability company, and GE Asset Management owns 33.33% of Shamrock TeleGuam Holdings, LLC.

(b) Shamrock TeleGuam Holdings, LLC, owns 89% of GTA. GTA is the sole owner of GTA Telecom LLC and numerous other limited liability companies that do business on Guam. See, Declaration of John Brady.

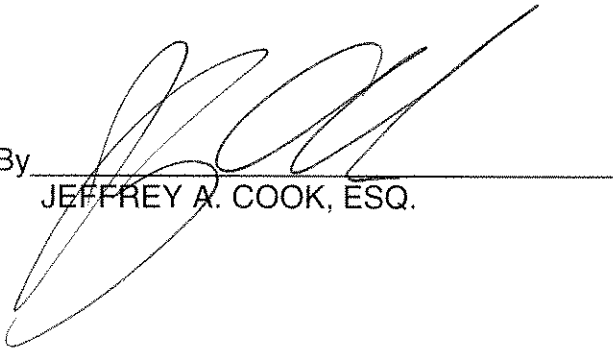
The original bid proposal by GTA mistakenly listed TeleGuam Holdings LLC as its sole owner. When this was brought to GTA's attention by Guam Community College (hereafter referred to as "GCC") after the protest was filed by PDS, GTA gave more in depth information instead of simply identifying Shamrock TeleGuam Holdings, LLC as the majority owner and identified the two (2) owners of that limited liability company. See, Declaration of John Brady. GTA never intended to hide any information from GCC or the public. In fact, it provided more information than was required when it provided the information as to the owners of the company that is the majority owner of GTA.

This response is provided to clear many misunderstanding created by the incorrect information provided in the Supplemental Brief filed by PDS.

Respectfully submitted this 10th day of December, 2010.

CUNLIFFE & COOK
A Professional Corporation
Attorneys for Real Party In Interest
TeleGuam Holdings LLC

By



JEFFREY A. COOK, ESQ.

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