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9 **PHIL-GETS (GUAM) INTERNATIONAL TRADING CORP.**
10 **dba J & B MODERN TECH**

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BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY

IN THE APPEAL OF

PHIL-GETS (GUAM)
INTERNATIONAL TRADING CORP.
dba J & B MODERN TECH,

Appellant.

Appeal No. OPA-PA-17-011

**APPELLANT'S MOTION FOR
CONTINUANCE**

COMES NOW Appellant Phil-Gets (Guam) International Trading Corp. dba J & B Modern Tech (herein "Appellant"), by and through counsel undersigned, and hereby respectfully submits its Motion for a short continuance of the Pre-Hearing Conference now scheduled on Friday, November 17, 2017 at 9:00 a.m., to any reasonable date after November 21, 2017, commencing November 22, 2017.

Appellant contacted counsel for Guam Community College ("GCC") on November 9, 2017, who had no objection to a continuance. In particular, Attorney R. Wrightson indicated that the subsequent dates of November 28, 29 and 30, and December 1, 2017 are available for her on a reschedule of the Pre-Hearing Conference based on off-island travel for Attorney Wrightson, at the same morning hour.

For good cause and grounds for the continuance, Appellant submits that its filed Objection to the assignment of the Hearing Officer Attorney Delia S. L. Wolff is a pending issue with the OPA for resolution. Further, undersigned counsel for Appellant has only been retained on November 8, 2017, the day before the three day Veteran's

1 Day holiday weekend. The file is substantial and significant time will be required to
2 review the record of the procurement.

3 The Notice of Pre-Hearing Conference was filed and served on November 7, 2017
4 that scheduled the Conference on November 17, 2017, only ten (10) days apart.
5 Respectfully, the parties and counsel need a reasonable period of time to prepare,
6 conduct legal review, consult with client representatives and study the record of the
7 procurement on appeal prior to meaningful participation in the Pre-Hearing
8 Conference.

9 **REQUEST FOR RELIEF**

10 Appellant respectfully requests that the Pre-Hearing Conference scheduled on
11 November 17, 2017 be rescheduled to a subsequent date between November 27 and
12 December 1, 2017.

13 DATED this 13 day of November, 2017.

14 Respectfully submitted,

15 **BERMAN O'CONNOR & MANN**
16 Attorneys for Appellant
17 **PHIL-GETS (GUAM) INTERNATIONAL**
TRADING CORP. dba J & B MODERN TECH

18 By: 

19 DANIEL J. BERMAN

20 **CERTIFICATE OF SERVICE**

21 I, Christine Pangelinan, hereby certify that on the 13th day of November, 2017, I
22 caused the foregoing *Appellant's Motion for Continuance* to be served as follows:

- 23 1) Via Hand Delivery to:
24 Rebecca Wrightson, Esq.
25 Cabot Mantanona LLP
26 Edge Bldg., Second Floor
27 929 S. Marine Corps Drive
28 Tamuning, Guam 96913

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2) Via U.S. Mail to:

Propacific Builders Corporation
750 Rt. 8, Suite 202
Barrigada, Guam 96913

DATED this 13th day of November, 2017.



CHRISTINE PANGELINAN