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OFFICE OF PUBLIC ACCOUNTABILITY PROCUREMENT APPEALS

DATE: Dec 11,2017

TIME: 11:28 NAM DPM BY: FDJ

FILE NO OPA-PA: 17-13

Attorneys for Appellant Core Tech International Corp.

PROCUREMENT APPEALS TERRITORY OF GUAM

IN THE APPEAL OF) Docket No. OPA PA-17-10
CORE TECH INTERNATIONAL CORP.,) DECLARATION OF ANITA P.
) ARRIOLA IN SUPPORT OF
Appellant.) APPELLANT CORE TECH
) INTERNATIONAL CORP.'S REPLY
) MEMORANDUM IN SUPPORT OF
) MOTION TO DISQUALIFY

ANITA P. ARRIOLA declares:

- 1. I am the attorney for Core Tech International Corp. ("CTI"), appellant in the above-captioned matter. I make this declaration in support of CTI's Reply Memorandum in Support of Motion to Disqualify the Department of Public Work's legal counsel Thomas Keeler. I have personal knowledge of the facts contained herein and if called as a witness I could and would testify competently thereto.
- 2. On Monday, November 27, 2017 I filed on behalf of CTI a Motion to Disqualify DPW's counsel Thomas Keeler. On Friday, December 1, 2017 Mr. Keeler contacted me by telephone and told me that he agreed he was disqualified from representing DPW in the appeal. He asked if I would agree to a delay in the OPA proceedings in order to find substitute counsel. I responded, "Of course." He said he would file a motion with OPA later that day to request a continuance in order for DPW to obtain substitute counsel who could get up to speed on the case.

- 3. On Monday, December 4, 2017, I called Mr. Keeler to inquire about the motion he said he was going to file on December 1 because I had not received it. He told me that after conferring with the Attorney General's office, "they" did not believe he was disqualified and DPW would be opposing the disqualification motion.
- 4. As discussed with Mr. Keeler, CTI would agree to a reasonable delay to allow DPW's substitute counsel to familiarize himself or herself with the case.

I declare under penalty of perjury under the laws of Guam that the foregoing is true and correct.

Dated this 11th day of December in Hagatna, Guam.

ANITA P. ARRIOLA