1	Joyce C.H. Tang	RECEIVED
2	Leslie A. Travis CIVILLE & TANG PLLC	OFFICE OF PUBLIC ACCOUNTABILITY PROCUREMENT APPEALS
3	330 Hernan Cortez Avenue Ste. 200 Hagåtña, Guam 96910	DATE: Dec . V, 2018
4	Tel: (671) 472-8868/9 Fax: (671) 477-2511	TIME: 4:58 □AM □PM BY: Ching FILE NO OPA-PA: 18-00-
5	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	FILE NO OPA-PA:
6	PROCUREMENT APPEAL	
7	IN THE OFFICE OF PUBLIC ACCOUNTABILITY	
8		
9	In the Appeal of	DOCKET NO. OPA-PA-18-002
10	Korando Corporation,	REQUEST FOR HEARING
11		
12	Appellant.	
13		
14		
15	On December 5, 2018, the Department of Public Works ("DPW"), by and through counse	
16	notified Korando Corporation (Korando") that necessary government witnesses, DPW Director Glenn	
17	Leon Guerrero and DPW Deputy Director Joaquin Blas may not be available to testify during the	
18	formal hearing scheduled to commence in this matter on December 17, 2018. See Email from T	
19	Keeler to L. Travis re: Korando Appeal, OPA-PA-18-002; Subpoena to Richelle Takara (December	
20	5, 2018), attached as Exhibit A hereto. In light of this information, Defendant Korando Corporation	
21	("Korando") requests a hearing to address the lack of availability of key witnesses.	
22	Submitted this 5 th day of December, 2018.	
23		
24	Cr	VILLE & TANG, PLLC
25	THE CONTRACT OF THE CONTRACT O	
26	1/Mu	
27	JOYCE C.H. TANG LESLIE A. TRAVIS	
28		orneys for Appellant Korando Corporation

EXHIBIT A



Leslie Travis < ltravis@civilletang.com>

Korando Appeal, OPA-PA-18-002; Subpoena to Richelle Takara

Tom Keeler <tkeeler@guamag.org>
Wed, Dec 5, 2018 at 11:34 AM Leslie Travis < ltravis@civilletang.com, Joyce Tang jtang@civilletang.com, Linda Hernandez Hernandez@guamag.org

Leslie and Joyce,

I am not authorized to accept service of the subpoena on behalf of the FHWA's Ms. Richelle Takara. I suggest that you contact FHWA's legal counsel, who I believe your office has previously communicated with. If assistance is needed, I can request that Ms. Takara provide her agency's counsel's contact information.

Also, am I correct in assuming that your office will coordinate with the OPA on Skype or other equipment needed for the hearing?

Please note that DPW's Director is traveling most of December. He returns from a trip on Monday, December 17, 2018, and then departs for vacation Wednesday, December 19, 2018. He does not return until January 7, 2019. He is available to testify Tuesday, December 18, 2018. PTG's employee Derrick Lehman will be on island through Wednesday, December 19, 2018.

Finally, Joaquin Blaz, DPW's Acting Highway Administrator, father's health is failing. He has been served a Subpoena however it is possible that Kin's father will need to be medivaced to Hawaii. If so, Mr. Blaz intends on traveling with his father. In this event, we will coordinate on a convenient time and date for him to testify via Skype.

Please contact me if you have any questions. Thanks.

Tom

Saina Ma'ase, Si Thomas P. Keeler Assistant Attorney General Office of the Attorney General 590 South Marine Corps Dr. Ste. 706, ITC Bldg. Tamuning, Guam 96931 Tel. No.: (671) 475-3324

Fax No.: (671) 472-2493 Email: tkeeler@guamag.org Website: www.guamag.org

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From: Leslie Travis [Itravis@civilletang.com] Sent: Tuesday, December 04, 2018 4:05 PM

To: Tom Keeler; Joyce Tang

Subject: Korando Appeal, OPA-PA-18-002; Subpoena to Richelle Takara

Tom,

The Hearing Officer has issued Korando's Subpoena to Richelle Takara for the formal hearing on December 17, 2018. I am writing to formalize Korando's inquiry as to whether you are willing to accept service of the subpoena on her behalf. I

have attached it here for your review.

Please let us know.

Thank you, Leslie

Leslie Travis

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