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PROCUREMENT APPEALS

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FILE No. OPA-PA 08-001

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PROCUREMENT APPEALS

8 IN THE APPEAL OF  
9 FAR EAST EQUIPMENT CO., LLC,  
10 Appellant.

APPEAL NO. OPA-PA-08-001

**MOTION FOR  
EXTENSION OF TIME**

12 COMES NOW, Appellant, Far East Equipment Co., LLC, through its attorneys,  
13 The Law Offices of John S. Unpingco & Associates, and motions the OPA for an  
14 extension of time in which to supplement its Grounds for Appeal. Appellant respectfully  
15 requests that the time in which to supplement its grounds for appeal (for the very limited  
16 purpose of explaining its electrical technical deviations and clarifications) be extended to  
17 February 5, 2008.

**DISCUSSION AND AUTHORITY**

19 Appellant filed an appeal on IFB GSA/PAG 07-007 on January 11, 2008. In its  
20 Grounds for Appeal, one of Appellant's grounds was that the rejection of Appellant's bid  
21 by GSA was erroneous. In support of this ground, Appellant sought to explain that its  
22 technical deviations and technical clarifications which GSA and PAG found unacceptable  
23 were in fact acceptable or would have been acceptable had discussions been allowed to  
24 occur.  
25

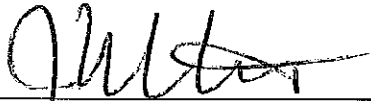
1  
2 Unfortunately, when the appeal was filed Appellant's ZPMC electrical engineers  
3 were away from China and Appellant could not respond to the unacceptable technical  
4 deviations and technical clarifications in the electrical area only. Therefore, pursuant to 2  
5 GAR § 12104(b)(5) Appellant was to supplement its grounds for appeal as to the  
6 electrical technical deviations and clarifications by January 18, 2008.

7 Appellant was not able to supplement its grounds and still has not been able to do  
8 so, due to an undersea earthquake that damaged China's main communication cable over  
9 one week ago. While communications have been rerouted, the high value of traffic  
10 during working hours makes it difficult to get through. See Declaration of John Limtiaco.

11 Accordingly, pursuant to 2 GAR § 12104(b)(5) Appellant respectfully requests an  
12 extension of the January 18, 2008 deadline for submission of its supplement to its  
13 Grounds of Appeal to February 5, 2008 due to unforeseen circumstances beyond its  
14 control.

15  
16 Submitted this 17th day of January 2008.

17  
18 THE LAW OFFICES OF JOHN S. UNPINGCO  
& ASSOCIATES, LLC

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20   
21 By: John S. Unpingco, Esq.