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11 *Attorneys for Interested Party*
12 *Guam Educational Facilities Foundation, Inc.*

13 **BEFORE THE OFFICE OF PUBLIC ACCOUNTABILITY**
14 **PROCUREMENT APPEALS**

14 IN THE APPEAL OF:

15
16 CORE TECH INTERNATIONAL CORP.,

17 Appellant.

14 **CONSOLIDATED APPEALS NOS.:**
15 **OPA-PA-16-007 AND OPA-PA-16-011**

16 **INTERESTED PARTY GUAM**
17 **EDUCATIONAL FACILITIES**
18 **FOUNDATION, INC.'S OBJECTION TO**
19 **CORE TECH INTERNATIONAL CORP.'S**
20 **WITNESS LIST AND SUBMISSION OF**
21 **GEFF'S SUPPLEMENTAL AND/OR**
22 **REBUTTAL WITNESS LIST**

21 **GUAM EDUCATIONAL FACILITIES FOUNDATION, INC.** ("GEFF"), an
22 interested party and the offeror selected as the most qualified in the subject procurement, hereby
23 states its objection to Appellant Core Tech International Corp.'s ("Core Tech") witness list filed
24 August 30, 2016, and respectfully submits the following list of potential supplemental and/or
25 rebuttal witnesses that GEFF may call during the hearing in this matter.

26 **OBJECTION**

27 Core Tech presumably included Mr. Edward J. Calvo on its witness list to address issue
28 no. 11 in Core Tech's list of issues filed on August 30, 2016. Issue no. 11 is not an issue properly

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1 before the Public Auditor in this Appeal for the reasons raised in GEF's Hearing Brief (at p. 26)
2 and during GEF's opening statements. Accordingly, GEF objects to the Public Auditor
3 receiving any testimony from Mr. Edward J. Calvo, or any other witness, relating to Core Tech's
4 issue no. 11.

5 **WITNESSES**

- 6 1. Henry J. Taitano
7 2. Glenn Leon Guerrero

8 GEF identifies the foregoing supplemental and/or rebuttal witnesses in the event that
9 Core Tech is permitted to present testimony or evidence on its issue no. 11 and/or call Mr.
10 Edward J. Calvo as a witness.

11 As stated in GEF's witness list filed August 26, 2016, GEF reserves its right to call
12 witnesses identified by Core Tech and the Department of Public Works ("DPW"). Additionally,
13 GEF reserves its right to identify additional witnesses in the event that Core Tech and DPW
14 identify witnesses who were not previously identified, or if Core Tech and DPW decide not to
15 call a witness that they have identified. GEF further reserves its right to identify additional
16 witnesses in the event that Core Tech's and DPW's witnesses present unexpected testimony.
17 GEF also reserves its right to call rebuttal witnesses.

18 Dated: September 14, 2016.

19 **CALVO FISHER & JACOB LLP**

20
21 By: 
22 **JANALYNN CRUZ DAMIAN**

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