



EDDIE BAZA CALVO
Governor

RAY TENORIO
Lieutenant Governor

Office of the Governor of Guam.

January 9, 2015

Mr. David L. Manning
Receiver Representative
Gershman Brickner & Bratton, Inc.
c/o Guam Solid Waste Authority
542 North Marine Corps Drive
Tamuning, Guam 96913

Dear Mr. Manning:

The Order of the District Court appointing Gershman Brickner & Bratton (“GBB”) as Receiver provides that the Receiver shall have “full and complete access to the documents, books, records, electronic databases held by any Government of Guam entity that has in its custody records *deemed necessary by the Receiver to ensure compliance with the Consent Decree.*” [ECF 239 at p. 17, § III(A)(2)(h)].

The Government of Guam is in the process of gathering the documents responsive to your request. In the meantime, although your letter of January 6, 2015, acknowledges that the compensation award issued by the Superior Court for the land taken to construct the Layon Landfill is an important issue related to the Consent Decree, it is unclear whether the documents requested are “deemed necessary by the Receiver to ensure compliance with the Consent Decree.”

In this regard, it is requested that the Receiver clarify the reason it deems the documents and the information requested as being necessary to ensure compliance with the Consent Decree. It is further requested that the Receiver clarify its position with respect to the obligation of GSWA to pay the compensation award or any part thereof.

Thank you.

SANDRA CRUZ-MILLER
Office Of the Governor of Guam

cc: Joyce C.H. Tang
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