

FEDERAL MANAGEMENT TEAM

James J. Casey, J.D. James J. Kiffer, Ph.D


790 Gov. Carlos G. Camacho Rd.

Tamuning, Guam 96911

671.647.1901 fax: 671.649.6948

fmt.dmhsa.guam@gmail.com

FILED
DISTRICT COURT OF GUAM

OCT 04 2010 

JEANNE G. QUINATA
CLERK OF COURT

UNITED STATES DISTRICT COURT
DISTRICT OF GUAM

15)	
16)	No. CV 01-0041
17)	
18)	PRELIMINARY RESPONSE OF THE
19)	FEDERAL MANAGEMENT TEAM TO
20)	THE OBJECTIONS AND/OR
21)	COMMENTS RE: THE APPROVED
22)	PLAN OF ACTION
23)	
24)	
25)	

J.C. et al.

Plaintiff,

v.

CAMACHO et al.,

Defendant.

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FEDERAL MANAGEMENT TEAM

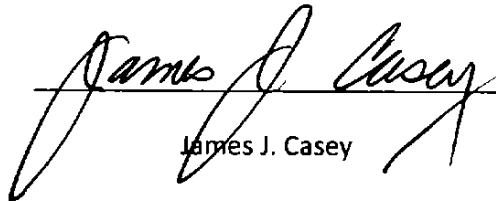
James Casey, J.D. James Kiffer, PhD
790 Gov. Carlos G. Camacho
Tamuning Guam 96911
Ph: 671.647.1901 Fax: 671.649.6948
fmt.dmhsa.guam@gmail.com

PRELIMINARY RESPONSE OF THE FEDERAL MANAGEMENT TEAM TO THE OBJECTIONS AND/OR COMMENTS RE: THE APPROVED PLAN OF ACTION

The Federal Management Team (FMT) would like to extend its sincere appreciation for both the time and effort expended by counsel, service providers, stakeholders and consumers in providing collective input, with respect to the Plan of Action that was approved by this Honorable Court on September 9, 2010 (Doc. No. 794). At the outset, the FMT would like to acknowledge the fact that many of the proffered suggestions are points well taken. In lieu of taking a posture which might very well be construed as defensive, in terms of responding to individual perceptions concerning involvement in the formulation of the Plan, the purported inadequacies contained therein and/or allegations that certain sections are superfluous, the FMT intends to take all submissions under review.

Taking the subject objections and/or comments under advisement is consistent with the March 2, 2010 Order appointing the FMT (Doc. No. 756). The section of this Order that speaks to the duties and responsibilities of the FMT, sets forth a procedure for amending the Plan, wherein it states "The Federal Management Team shall report to the Court every ninety (90) days following approval of the Plan on: ... 3) **any modifications or additions to the objectives and tasks** that the [FMT] has undertaken in fulfillment of the Plan." (Id at page 7). Consistent with this directive, the FMT will fastidiously review all submissions, tailor the Plan, incorporating changes where needed and dutifully note the "modifications or additions" within the aforementioned Court-ordered report, due December 7, 2010.

Respectively submitted this 4th day of October 4, 2010.



James J. Casey