



The Law Offices of

PHILLIPS & BORDALLO

A Professional Corporation

410 West O'Brien Drive, Suite 102 Hagåtña, Guam 96910-5044

Tel: (671) 477-ABCD (2223) • Fax: (671) 477-2FAX (2329)

"I Erensia, Lina'Ia', Espiritu-ta"

FILED
DISTRICT COURT OF GUAM

DEC 16 2010

JEANNE G. QUINATA
CLERK OF COURT

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Attorneys for Defendants
EDWARD B. CALVO and RAY TENORIO

IN THE DISTRICT COURT OF GUAM

CARL T.C. GUTIERREZ, FRANK AGUON,)
JR., and JOHN and JANE DOE CITIZEN)
PLAINTIFFS 1-1000,)

Plaintiffs,)

vs.)

THE GUAM ELECTION COMMISSION, JOHN)
BLAS, JOSHUA TENORIO, JOSEPH MESA,)
ALICE TAIJERON, JOHN TERLAJE, ROBERT)
CRUZ, MARTHA RUTH, JOHN TAITANO,)
EDWARD B. CALVO, RAY TENORIO, and)
JOHN and JANE DOE DEFENDANTS 1-1000,)

Defendants.)

CIVIL CASE NO. CV10-00033

**MOTION TO REMAND
PURSUANT TO 28 U.S.C.
§1447(c)**

**[ORAL ARGUMENT NOT
REQUESTED]**

Defendants EDWARD B. CALVO and RAY TENORIO, through counsel
PHILLIPS & BORDALLO, P.C., by Michael F. Phillips and Ricardo D. Bordallo, hereby
move this Court for an order remanding the above-entitled action. This Motion is made

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

pursuant to 28 U.S.C. §1447(c) and is based upon this Motion, the Memorandum of Points and Authorities filed contemporaneously herewith, the record of the proceedings and papers on file herein.

Dated this 16th day of December, 2010.

PHILLIPS & BORDALLO, P.C.
Attorneys for Defendants
EDWARD B. CALVO and
RAY TENORIO

BY: 

MICHAEL F. PHILLIPS

BY: 

RICARDO D. BORDALLO