

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS
Washington, D.C.**

BID PROTEST

CONTINENTAL SERVICE GROUP, INC.; and
PIONEER CREDIT RECOVERY, INC.,

Plaintiffs,

and

COLLECTION TECHNOLOGY, INC.,
PROGRESSIVE FINANCIAL SERVICES, INC., and
ALLTRAN EDUCATION, INC.

Intervenor-Plaintiffs,

v.

THE UNITED STATES OF AMERICA,

Defendant,

and

THE CBE GROUP, INC.; PREMIERE CREDIT
OF NORTH AMERICA, LLC; GC SERVICES
LIMITED PARTNERSHIP; FINANCIAL
MANAGEMENT SYSTEMS, INC.;
VALUE RECOVERY HOLDINGS, LLC;
WINDHAM PROFESSIONALS, INC.; and
AUTOMATED COLLECTION SERVICES, INC.,

Intervenor-Defendants.

CFC Nos. 17-449C, 17-499C

Chief Judge Susan G. Braden

PLAINTIFF PIONEER CREDIT RECOVERY, INC.
NOTICE OF APPEAL

Pursuant to Rule 58.1 of the Rules of the Court of Federal Claims ("RCFC"), Plaintiff Pioneer Credit Recovery, Inc. ("Pioneer") hereby provides notice that it is appealing to the U.S. Court of Appeals for the Federal Circuit ("CAFC") from the U.S. Court of Federal Claims'

("COFC") May 31, 2017 preliminary injunction entered in the above referenced consolidated cases. ECF 143.

Specifically, Pioneer is appealing that portion of the injunction that prohibits the U.S. Department of Education ("ED") from allowing Pioneer to perform under its award term extension ("ATE") contract awarded in April 2017 under a separate procurement than is the subject of the cases noted above. (Pioneer's 2017 ATE contract is Order No. ED-FSA-17-O-0008 under Pioneer Contract No. GS-23F-0127K. The 2017 ATE was awarded following agency corrective action arising from Coast Professional, Inc. et al. v. United States, 120 Fed. Cl. 727 (2015), vacated and remanded, 828 F.3d 1349 (Fed. Cir. 2016)).

Pioneer is aware of the related Intervenor-Plaintiff Alltran Education, Inc.'s ("Alltran") and Defendant's appeals, CAFC Case Nos. 17-2155 and 17-2215, respectively. These appeals have been consolidated under CAFC Case No. 17-2155. *Pioneer will seek to have its appeal consolidated with CAFC Case No. 17-2155. Opening briefs in the Alltran and Defendant appeals are due August 14, 2017. CAFC Case No. 17-2155, ECF 80. Pioneer will file its opening brief in this appeal in accordance with the schedule for those consolidated cases.*

Respectfully submitted,

Date: July 21, 2017

By: /s/ Jonathan D. Shaffer
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CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of July 2017, Pioneer Credit Recovery, Inc.'s "NOTICE OF APPEAL" was electronically filed. I understand that notice of this filing will be sent to all parties by operations of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Jonathan D. Shaffer

Jonathan D. Shaffer