

## CLIENT ALERT

### Cardinal Change In MOD Requires Competition

Aug.23.2004

Continuing a recent trend of success by bid protesters in the Court of Federal Claims, in *CW Gov't Travel, Inc. v. U.S.* (Aug. 3, 2004), the court agreed that a modification to an existing contract of a competitor called for services outside the general scope of the original contract and that the work had to be competed. The protester attained this relief even though the mod had been effected a year previously.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.