

Republic of the Philippines
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
Region IV-B MIMAROPA
Manila

December 29, 2021

MARIA LOURDES G. FERRER, CESO III

The Regional Executive Director
DENR-MIMAROPA Region IV-B

Attention: **ENGR. ROMAN G. LEGASPI**
OIC Surveys and Mapping Division


Dear Madam/Sir:

This letter is in connection with the Protest filed by FELIZA JAVIER @ FELIZA DE LEON and CAPT FARLEY QUIPOT PN (Ret), now pending with the Community Environment And Natural Resources Office- Puerto Princesa City (DENR CENRO-PPC), under land case number 0501. My clients are anxious of the conflict of interest on the part of the office of the DENR CENRO-PPC because some of the employees therein have had participation in the creation of lot 86, portion of which is a contiguous part of the land my clients occupy since the year 2003 to present, and is the subject of their Protest.

In this vein, we are respectfully furnishing your office with copy of the Motion For Inhibition, with prayer that the aforementioned case be transferred to your Office, the DENR-MIMAROPA Region IV-B.

Thank you very much.

Very truly yours,

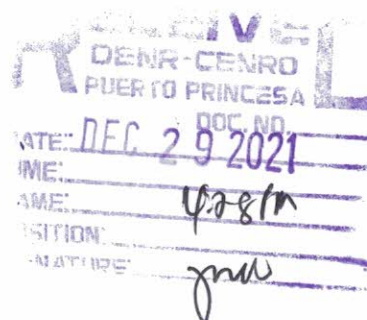


Atty. Marivic M. Adia-Bungay
Counsel for the Protestors

Republic of the Philippines
DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
COMMUNITY ENVIRONMENT AND NATURAL RESOURCES OFFICE
Puerto Princesa City

FELIZA JAVIER @ FELIZA DE LEON and
CAPT FARLEY QUIPOT PN (Ret),
Protestors,

LAND CASE NO. 0501



-versus-

for:

CITY GOVERNMENT OF PUERTO PRINCESA,
Defendants,

Lot No. 86, Sgs-04-002238 (portion)
Identical to Lot No. 3584, Cad 800-D
Sitio Tagkawayan
Barangay Bacungan
Puerto Princesa City, Palawan

X ----- X

MOTION FOR INHIBITION

Come now, Protestors through undersigned Counsel, unto this Honorable Office, most respectfully aver:

- 1.) That she is the counsel for Protestors, FELIZA JAVIER @ FELIZA DE LEON and CAPT FARLEY QUIPOT PN (Ret);
- 2.) That, the undersigned received a letter from the Protestors expressing concerns on conflict of interest of the Honorable Office in further hearing and determination of facts and evidence of the instant case in view of the involvement of a number of CENRO-Puerto Princesa City and PENRO personnel (some have retired and some are still employed with the CENRO-PPC and some are still connected with PENRO) in the creation of lot 86, and the surreptitious inclusion thereto of the portion of the lot being occupied by the Protestors since the year 2003 to present, out of which, the conflict and issues subject of the instant case arose;

A handwritten signature in blue ink, located at the bottom right of the page.

- 3.) That, to avoid any possible doubts and questions on the impartiality and cold neutrality of this Honorable Office in the determination of facts, evidence and issues in this case, the undersigned, most respectfully requests for its inhibition from handling and determination of this case, and for the transfer of the case to the DENR-MIMAROPA Region;
- 4.) That, this Motion is not intended to cause delay to the resolution of the case but on reasons afore-given;
- 5.) For reference, attached to this letter is the letter signed by Protestors, FELIZA JAVIER @ FELIZA DE LEON and CAPT FARLEY QUIPOT PN (Ret).

Prayer

WHEREFORE foregoing premises considered, the undersigned respectfully and humbly appeals to the sound discretion of this Honorable Office praying that this Motion be granted and this case be transferred to DENR-MIMAROPA.

Respectfully submitted. This 29th day of December 2021.


ATTY. MARIVIC M. ADIA-BUNGAY

Counsel for the Protestors

Gacott Bldg., Carandang Street,

Puerto Princesa City

PTR NO. 564-01-14/01-03-2020

IBP LIFE NO. 011169/ 08-22-2012

Roll No. 53331

MCLE Compliance No.VI-0003101/08-10-2-17

AttyMarivicAdiaBungay2020@gmail.com

CP Number: 09100069625

Copy furnished:

ATTY. NORMAN YAP

Counsel for the Defendant

City Government of Puerto Princesa

— deservang 12/29/2021 4:05pm

DENR-MIMAROPA Region

Roxas Boulevard

Ermita, Manila

December 27, 2021

Dear Atty Mariano Bungay:

Atty Bungay, ang sulat na ito ay patungkol sa Land Case no. 0501 na ang reklamo ay naka-tinitiw ngayon sa CENRO, Puerto Princesa City.

Nais po sana naming hilingin na kung maari ay mailipat sa Regional Office ang pagdining at pagmukisliga sa kaso; dahil may mga empleyado na nasa CENRO, Puerto Princesa City na may kinalaman at partisipasyon sa pagkakamoon ng lot 86, sa sitio Tagawayan, Bacungan, na lingid sa naming kaalaman.

Ang kanilang presensya sa opisina ng CENRO at PORO ay maging maka-apekto sa pananaw at resulta ng kanilang investigasyon.

Sinasagay, gumagalang,

Capt Farley G. Quirol PN(Ret)

Feliza Dion Javier