

VERGARA RODRIGUEZ LAW OFFICE

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ATTY. ELENA M. VERGARA-RODRIGUEZ ATTY. EARL ALLENDE V. RODRIGUEZ

November 18, 2021

RED MARIA LOURDES G. FERRER, CESO III

Regional Executive Director

ATTY. GANDHI FLORES

Chief, Legal Division

Department of Environment and Natural Resources

Roxas Boulevard, Ermita

Manila

ATTN: **VIRGINIA M. REGODON**

Chief, Land Records Section

Dear RED Ferrer and Atty. Flores,

I am writing in behalf of my client, **MRS. TERESITA FRIA-TABANG**, whom I represent in the case she filed before the Regional Trial Court: Petition for Correction of Entry docketed as Land Case No. 3194 and pending before RTC Branch 95. Our petition seeks to correct the erroneous land area indicated in Original Certificate of Title No. G-5838 which is SIX HUNDRED (600 sq. m.) SQUARE METERS instead of the true and correct land area which is THIRTEEN THOUSAND, FIVE HUNDRED EIGHTEEN (13,518) SQUARE METERS. I am attaching herewith the scanned copy of the petition, together with its relevant attachments, for your ready reference.

Among the annexes and documentary evidence attached to support our petition is the Lot Computation Data in the name of Pedro Fria, duly certified by Mrs. Virginia M. Regodon and photocopy of Survey Plan H-182209. In relation to this, and due to the unavailability of records here in PENRO-Palawan, may I request for original certified photocopies of the following documents:

1. Original /Certified true copy of the Lot Computation Data in the name of Pedro Fria;
2. Original /Certified true copy of Survey Plan No. H-182209;
3. Original /Certified true of Cadastral Map;
4. Original /Certified true copy of Narrative Technical Description;

In addition, may I request that Ms. Virginia M. Regodon or any of your technical personnel, testify in court to identify the above-documents and specifically to confirm that the lot area for the concerned land is 13,518 sq. m., not 600 sq. m as indicated in the certificate of title issued by the Register of Deeds which is erroneous land area and does not conform to the area as indicated in the official documents on file with your office which were the bases for the

issuance of the title. I will prepare a draft Judicial Affidavit for the witness from your office as soon as I receive the above-requested documents.

Due to the health limitations on in-court hearing, the scheduled presentation of the witness from your office will be via on-line/microsoft teams. I will be requesting for the issuance of a Subpoena for the witness for the next scheduled hearing which is March 17, 2022 at 8:30 o'clock in the morning.

Thank you very much and I hope to receive your favorable action on this request.

At Puerto Princesa City, November 18, 2021.

Very Respectfully yours,



ATTY. EARL ALLENDE V. RODRIGUEZ