## Republic of the Philippines MUNICIPAL CIRCUIT TRIAL COURT CORON-BUSUANGA-GAUDENCIO E. ABORDO

Province of Palawan

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Plaintiff. Crim. Case No. 4022

-versus- For:

RYAN ABORATIGUE
MARVIN ABORATIGUE and

PORMENCIO ABORATIGUE
Accused

x - - - - - - - - - - - - x

Viol. Of Sec.77 of PD 705, as amended

## MOTION FOR EXTENSION OF TIME TO FILE PLEA-BARGAINING PROPOSAL

Accused, by the undersigned counsel, and unto this Honorable Office, most respectfully states that:

- 1. On August 20, 2021, the Honorable Court ordered this representation to submit a proposal for plea-bargaining ten (10) from the said date;
- 2. The ten-day period was supposed to end on the 30<sup>th</sup> of August, however, it is an official holiday. Being so, the proposal should be furnished to the prosecutor and submitted to the court, today, August 31, 2021;
- 3. This counsel underwent a strict home quarantine from August 22 to 27, hence, she failed to meet all the accused personally to thoroughly explain the proposal and its consequences to all them;
- 4.. All accused, except Ryan Aboratigue who is now currently detained at Coron Police Station, live in a far-flung barangay wherein communication is quite difficult. Today this counsel is still arranging the possibility that they could come to the office within this week;
- 5. As such, undersigned counsel is constrained to request for an additional period of five (5) days from today within which to submit the Proposal.

5. This Motion is not intended to delay any proceeding but solely due to the foregoing reasons.

## PRAYER

WHEREFORE, Respondent most respectfully prays of this Honorable Court that they be given an additional period of five (5) days from today within which to submit the proposal.

Other relief just and equitable are likewise prayed for.

Coron, Palawan. August 31, 2021

PUBLIC ATTORNEY'S OFFICE Coron, Palawan District Office

By:

BETHEL FAITH G. BERONIO

Public Áttorney I

ROA 72329/30 June 2018

Noted By

JOCELYN G. FUMERA

**Public Attorney III** 

ROA 60881/26 March 2012