



Republic of the Philippines

OFFICE OF THE SOLICITOR GENERAL

ORIGINAL

10 August 2023

**HON. MARIA ANTONIA YULO LOYZAGA**

*Secretary*

Department of Environment and Natural Resources (DENR)  
Visayas Avenue, Diliman, Quezon City

ATTN: **ATTY. ERNESTO D. ADOBO JR., CESO I**  
*Undersecretary for Legal and Administration*  
DENR, Visayas Avenue, Diliman Quezon City

**ATTY. MICHELLE ANGELICA ANGELICA D. GO, LL.M. CESO II**  
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**ATTY. DANILO U. UYKIENG**  
*OIC, Director*  
DENR, Visayas Avenue, Diliman Quezon City

**ENGR. FELIZARDO A. GACAD, JR.**  
*Regional Director*  
DENR-MGB Mimaropa  
7<sup>th</sup> Floor, DENR Building, 1515 Roxas Blvd., Ermita, Manila

Re: *Indigenous Cultural Communities of BICAMM Ancestral Domain,  
Brooke's Point, Palawan v. Office of the Secretary, et al.;*  
Supreme Court Manila, G.R. No. \_\_\_\_  
OSG Docket No. 23-018572

Dear Secretary Loyzaga:

Please be informed that on 03 August 2023, the Office of the Solicitor General (OSG) received a copy of the Petition for Writ of *Kalikasan* dated 27 July 2023. Attached is a copy of said petition, for your reference.<sup>1</sup>

<sup>1</sup> Annex "A", Petition for Writ of *Kalikasan* dated 27 July 2023

Although the Supreme Court has not yet directed the public respondents to file the appropriate responsive pleading to the Petition for Writ of Kalikasan, we believe that it will be forthcoming very soon. Thus, we deem it prudent to coordinate with your good office this early to allow us more time to study, strategize and prepare the necessary pleading that will be required of us by the Supreme Court. As you may well know, the periods prescribed under the Rules on Environmental Cases are quite restrictive, thus the need to prepare this early on.

In this regard, may we request the DENR to provide the OSG copies of the following documents:

1. Case Briefer (procedural and factual antecedents);
2. Pertinent DENR/MGB issuances, orders or similar documents;
3. Judicial Affidavits of potential witness;
4. Reports pertaining to the issues raised in the petition;
5. An outline (in relation to item 1) with admissions and denials on the allegations in the petition and arguments in support of the government's position in this case; and
6. Other such documents that may aid us in drafting the required comment or Return of the Writ.

Should your office have any queries, you may coordinate with Associate Solicitor Lanz Aidan L. Olives at mobile no. 0917-502-3485 or email at [lalolives@osg.gov.ph](mailto:lalolives@osg.gov.ph), or through his legal secretary, Ms. Kriztelle Marie Joy N. Encinares at mobile no. 0927-888-4365 or email at [kmjnencinares@osg.gov.ph](mailto:kmjnencinares@osg.gov.ph). Kindly advise us of the names and contact details of the person that the OSG can directly coordinate with relative to this case.

Your usual prompt response to our requests would be highly appreciated.

Thank you.

Very truly yours,

**MENARDO I. GUEVARRA**  
*Solicitor General*

  
**GILBERT U. MEDRANO**  
*Assistant Solicitor General*

  
**LANZ AIDAN L. OLIVES**  
*Associate Solicitor II*