

Republic of the Philippines
REGIONAL TRIAL COURT
Fourth Judicial Region
Branch 163, Coron, Palawan

**BCT TRADING AND
CONSTRUCTION ET AL.,**
Plaintiffs,

- versus -

Civil Case CRN-1084
For: Injunction & Damages

**ROBERTO B. MAGALLANES
AND JOSE B. MAGALLANES,
JR., ET AL.**

Defendants.

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COMMENT / OPPOSITION

(to the Motion for the Resolution and Issuance of
Writ of Preliminary Injunction)

Defendant **PHILIPPINE RECLAMATION AUTHORITY**
(PRA), by counsel, respectfully states:

1. On 12 December 2023, PRA, through counsel received via electronic mail, a copy of the Provincial Government of Palawan's (Province) Motion for the Resolution and Issuance of Writ of Preliminary Injunction (Motion), praying that this Honorable Court issue an *ex-parte* Temporary Restraining Order (TRO) and Writ of Preliminary Injunction against SAGIP CORON and any persons acting on their behalf, from performing any activity over the reclaimed area.

2. As the agency forfeiting the reclaimed land in favor of the National Government, PRA opposes the motion based on the following grounds:



ARGUMENTS AND DISCUSSION

**THE PROVINCE MERELY ADOPTED
THE COMPLAINT OF THE
ORIGINAL PLAINTIFFS, WHOSE
PRAYER FOR PRELIMINARY
INJUNCTION, HAS BEEN DENIED
WITH FINALITY.**

3. A reading of the Motion quickly reveals that the Province did not raise any new factual or legal allegation that would support the prayer for TRO or Writ of Preliminary Injunction, and merely adopted the allegations in the original complaint. According to the Province, as the Plaintiffs' partner in the Contractual Joint Venture Agreement (CJVA), it has the mutual obligation to protect the project against objection, negative propaganda, litigation and similar opposition. Thus, it is praying anew, that injunctive writ be issued in its favor.

4. The Province's Motion is highly improper and should be dismissed outright. It will be recalled that during the 21 September 2023 hearing, Plaintiffs' Motion for Reconsideration (MR) of this Honorable Court's 13 June 2023 Resolution—denying the prayer for preliminary writ—was denied. No further relief was sought by the Plaintiffs, thus, said Order is now final.

5. By praying anew for the issuance of a preliminary writ, the Province is attempting to thwart the earlier 13 June 2023 Resolution of this Honorable Court by simply reiterating Plaintiffs' motion for the issuance of a preliminary writ. This is not only procedurally infirm but highly prejudicial to the defendants, considering that the arguments and allegations originally raised by the parties were already threshed out, duly considered, and resolved by this Honorable Court prior to the issuance of the 13 June 2023 Resolution. The Province did not raise any new matter or allegation that would support its present prayer since it merely adopted the allegations in the Complaint.

6. The Province's intervention, although allowed by this Honorable Court, should not be prejudicial to the defendants nor circumvent the Rules on availing the remedies in case of an unfavorable resolution/order. By moving for the issuance of a TRO/Writ of Preliminary Injunction anew, the Province attempts to overturn this Honorable Court's 13 June 2023 Resolution, which has already attained finality.

**THE PROVINCE FAILED TO
ESTABLISH THE ELEMENTS THAT
WOULD WARRANT THE ISSUANCE
OF AN INJUNCTIVE WRIT.**

7. Even assuming that the Motion is not denied outright, the Province is still not entitled to the issuance of a TRO or Writ of Preliminary Injunction since it failed to establish the elements to support its issuance.

8. Section 3, Rule 58 of the Revised Rules of Court provides for the grounds for the issuance of an injunctive writ:

Sec. 3. Grounds for issuance of preliminary injunction. -A preliminary injunction may be granted when it is established:

(a) That the applicant is entitled to the relief demanded, and the whole or part of such relief consists in restraining the commission or continuance of the act or acts complained of, or in requiring the performance of an act or acts, either for a limited period or perpetually;

(b) That the commission, continuance or non-performance of the act or acts complained of during the litigation would probably work injustice to the applicant; or

(c) That a party, court, agency or a person is doing, threatening, or is attempting to do, or is procuring or suffering to be done, some act or acts probably in violation of the rights of the applicant respecting the subject of the action or proceeding, and tending to render the judgment ineffectual. (Emphasis supplied)

9. The Supreme Court held in Sumifru (Philippines) Corporation vs. Spouses Cereño,¹ that the following requisites should be established before a writ of preliminary injunction may be issued:

Thus, the following requisites must be proved before a writ of preliminary injunction, whether mandatory or prohibitory, will be issued: (1) **the applicant must have a clear and unmistakable right to be protected, that is a right *in esse***; (2) **there is a material and substantial invasion of such right**; (3) **there is an urgent need for the writ to prevent irreparable injury to the applicant**; and (4) **no other ordinary, speedy, and adequate remedy exists to prevent the infliction of irreparable injury**.

A writ of preliminary injunction, being an extraordinary event, one deemed as a strong arm of equity or a transcendent remedy, must be granted only in the face of **injury to actual and existing substantial rights**. A right to be protected by injunction means a right clearly founded on or granted by law or is enforceable as a matter of law. An injunction is not a remedy to protect or enforce contingent, abstract, or future rights; it will not issue to protect a right not *in esse*, and which may never arise, or to restrain an act which does not give rise to a cause of action. When the complainant's right is doubtful or disputed, he does not have a clear legal right and, therefore, injunction is not proper. **While it is not required that the right claimed by the applicant, as basis for seeking injunctive relief, be conclusively established, it is still necessary to show, at least tentatively, that the right exists and is not vitiated by any substantial challenge or contradiction.**
(Emphasis supplied)

10. In this case, the Province, like Plaintiffs, has no **clear and unmistakable right** that will entitle it to an injunctive writ. Since the reclaimed land was forfeited in favor of PRA, the ownership of the land belongs to the National Government. Apart from a general allegation that the forfeiture order is "not final", the Province failed to cite any law or to present evidence that can support such position. Plaintiffs' Complaint, which was adopted by the Province, likewise failed to show any basis that can support this assertion. A naked assertion cannot overthrow the presumption of validity or regularity that attaches to the official act of PRA in forfeiting the reclaimed land in favor of the National Government.

¹ GR 218236, 7 February 2018.

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11. In the meantime, Section 3 of PRA AO 2007-2² states that no reclamation projects shall be undertaken “*without the prior permit and approval thereof by the PRA or the President of the Philippines.*” Further, Section 7 thereof provides that reclamation projects undertaken without the required approval of the PRA or the President of the Philippines shall be considered **illegal and shall be forfeited to the State without need of judicial action** pursuant to PD 3-A³, thus:

Section 7. Reclamation projects undertaken without the required approval of the PRA or the President of the Philippines contrary to the provisions of Presidential Decree No. 1084 as amended by Executive Order No. 525 and Executive Order No. 543, shall be considered illegal and shall be forfeited to the State pursuant to Presidential Decree No. 3-A. (Emphasis supplied)

12. It bears stressing that to be entitled to an injunctive writ, the right to be protected and the violation against that right must be shown. A writ of preliminary injunction may be issued only upon clear showing of an actual existing right to be protected during the pendency of the principal action. When the complainant's right or title is doubtful or disputed, the complainant does not have a clear legal right and, therefore, the issuance of the injunctive relief is not proper.⁴

13. Thus, the Province failed to establish the *first element*—“**clear and unmistakable right**”—for its entitlement to an injunctive writ. Considering that the forfeiture order effectively vested ownership over the reclaimed land in favor of the National Government, the Province’s “right” over the land is unclear and doubtful.

14. Since the Province’s “clear and unmistakable right” is lacking, the *second element* of “**material and substantial invasion of such right**” cannot exist. Furthermore, since the Province adopted Plaintiffs’ Complaint, there is nothing there that establishes any “invasion of right” committed by PRA.

² IMPLEMENTING RULES AND REGULATIONS (IRR) OF EXECUTIVE ORDER NO. 543 (EO 543) DATED JUNE 24, 2006 DELEGATING TO THE PHILIPPINE RECLAMATION AUTHORITY (PRA) THE POWER TO APPROVE RECLAMATION PROJECTS.

³ Amending Section 7 of Presidential Decree No. 3 dated September 26, 1972 by providing for the exclusive prosecution by administration or by contract of Reclamation Projects.

⁴ *Incorporators of Mindanao Institute, Inc. v. United Church of Christ in the Philippines*, GR 171765, 21 March 2012.

15. As for the *third element* of “**urgent need to prevent grave and irreparable injury**,” the same is also absent.

16. In its Motion, the Province merely stated that there is a “possible and continuing threat that the defendants may begin in their unlawful activities under the guise of so-called mitigation measures,” without presenting any bases or proof that would support such a general statement. Apart from failing to present arguments that will rebut the effects of PRA’s forfeiture of the reclaimed land—which will be further discussed below—the Province failed to allege any fact that will support the urgency that necessitates the issuance of a TRO or writ of preliminary injunction.

17. In *Evvy Construction and Development Corporation vs. Valiant Roll Forming Sales Corporation*,⁵ the Supreme Court held that the applicant for injunctive writ must establish the urgent and paramount necessity that warrants its issuance; if the acts sought to be enjoined were already done, there is no practical effect for the issuance of a writ, thus:

However, in applications for provisional injunctive writs the applicant **must also prove the urgency of the application**. The possibility of a grave and irreparable injury must be established, at least tentatively, to justify the restraint of the act complained of. It is “[a]s the term itself suggests ... temporary, subject to the final disposition of the principal action.” Its sole objective is “to preserve the status quo until the merits can be heard.”

Petitioner alleges that the execution sale and the prior annotations on its title caused “crucial investors and buyers” to withdraw, “notwithstanding the considerable costs and expenses [it] already incurred.” This is the grave and irreparable damage it sought to be protected from. However, the feared “damage” was caused by the execution sale and the annotations already made on the title. It even admits that the annotations were “impairing the progress of [its] housing development.” In other words, petitioner failed to establish the urgent and paramount necessity of *preventing further* annotations on the title.

⁵ GR 207938, 11 October 2017.

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Thus, what petitioner actually seeks is the removal of the annotations on its title, which is precisely what it asked for in its Complaint for Quieting of Title/Removal of Cloud, Annulment of Execution Sale and Certificate of Sale, and Damages before the trial court. **Injunctive relief would have no practical effect considering that the purported damage it seeks to be protected from has already been done. Therefore, its proper remedy is not the issuance of an injunctive writ but to thresh out the merits of its Complaint before the trial court.** (Emphasis supplied)

18. In this case, the Province failed to allege that the threat of committing acts sought to be enjoined are continuing; thereby establishing urgency.

19. With respect to the nature of the "irreparable injury," the Supreme Court in Social Security Commission v. Bayona⁶ held:

Damages are irreparable within the meaning of the rule relative to the issuance of injunction where **there is no standard by which their amount can be measured with reasonable accuracy.** "An irreparable injury which a court of equity will enjoin includes that degree of wrong of a repeated and continuing kind which **produce hurt, inconvenience, or damage that can be estimated only by conjecture, and not by any accurate standard of measurement.**" An irreparable injury to authorize an injunction consists of a serious charge of, or is destructive to, the property it affects, either physically or in the character in which it has been held and enjoined, or when the property has some peculiar quality or use, so that **its pecuniary value will not fairly recompense the owner of the loss thereof.**

(Emphasis supplied)

20. In Plaintiffs' Complaint, which was adopted by the Province, the damages that may be suffered by reason of the conduct of the purported excavation works, are actually easily subject to mathematical computation, as Plaintiffs themselves inferentially admitted in their Complaint. Paragraph 4.01 of the Plaintiffs' Complaint thus alleged:

4.01 There is absolutely no doubt, and defendants themselves will not deny, that they cause excavation of **approximately 2,300 cubic meters of the reclaimed land xxx.**

⁶ GR L-13555, 30 May 1962.

(Emphasis supplied)

21. Furthermore, Paragraph 4.03 of the Complaint stated:

By plaintiffs' assessment, immediately restoring the excavated area to its former state will prevent further damage to the reclaimed area. **However, such restoration will cost approximately Php 3,000,000.00** for which defendants Magallanes must be made liable to pay. (Emphasis supplied)

22. As gleaned from the Plaintiffs' allegations, there is actually *pecuniary value* in the conduct of the excavation works, thus, in contrast with what is considered as "irreparable injury" as discussed above.

23. On the other hand, it is the State and the country's environment as a whole, that would suffer "irreparable injury" if the Province together with Plaintiffs, would be allowed to proceed with the illegal reclamation activities in the area or if the rehabilitation measures being taken in the illegally reclaimed area be enjoined.

24. A site inspection of the area revealed that the reclamation was done illegally and without the monitoring support of the proper government agencies, destroying immensely the mangrove colonies in the area. Not only did the Province and Plaintiffs inflict environmental damage, the reclamation likewise blocked the natural flow of sea water in the area causing stagnation and slow death of sea living creatures and organisms within the vicinity. Thus, the excavation of portions of the reclamation works in the area was necessary to create an open canal for the water to flow freely and for the remaining mangroves to thrive and be saved.

25. All told, any injunctive writ that may be granted in favor of Plaintiffs and the Province that will stop the proper government agencies from implementing the necessary rehabilitation and mitigating measures caused by the illegal reclamation will cause grave environmental damage that are far-reaching and beyond repair.

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**ANY INJUNCTION PRAYED FOR
AGAINST PRA IS RENDERED
MOOT DUE TO THE EFFECTIVITY
OF THE FORFEITURE ORDER.**

26. As stated earlier, the declaration of the “illegal” reclamation resulted in the forfeiture of the reclaimed land in favor of the National Government. Even assuming that the injunction being sought in this case is “only” directed against Sagip Coron/Magallanes Brothers and/or any person/s acting on their behalf, the National Government through the PRA, will be adversely affected by any injunction issued involving the reclaimed land.

27. Since the Province and Plaintiffs seek to enjoin any activity conducted over the reclaimed land in order to protect their supposed interest over the same, said interest is now rendered moot due to the Forfeiture Order.

28. In Co, Sr. et al. vs. The Philippine Canine Club, Inc.⁷, the Supreme Court held:

Moreover, the issuance of a preliminary injunction is not intended to correct a wrong done in the past, or to redress an injury already sustained, or to punish wrongful acts already committed, **but to preserve and protect the rights of the litigant during the pendency of the case.**

In *Philippine National Bank v. Court of Appeals*, the Court ruled that **injunctive reliefs are preservative remedies for the protection of substantive rights and interests. When the act sought to be enjoined has become *fait accompli*, the prayer for provisional remedy should be denied.**

(Emphasis supplied)

29. Considering that the reclaimed land has been forfeited in favor of the National Government, apart from establishing the requirements of an injunctive writ such as “clear and unmistakable right”, it behooves upon the Province to show that the violative acts are threatened and yet to be committed. Otherwise, the application for injunctive writ shall fail.

⁷ GR 190112, 22 April 2015.

30. In the same case of Co, Sr. et al.⁸, the Supreme Court further stated:

It is a well-established rule that **consummated acts can no longer be restrained by injunction**. When the acts sought to be prevented by injunction or prohibition have already been performed or completed prior to the filing of the injunction suit, nothing more can be enjoined or restrained; a writ of injunction then becomes moot and academic, and the court, by mere issuance of the writ, can no longer stop or undo the act. To do so would violate the sole purpose of a prohibitive injunction, that is, to preserve the *status quo*.
(Emphasis supplied)

31. In this case, the Province failed to show that the threatened acts of the defendants in this case are continuing and that the application for injunctive relief is preservative in nature. Thus, the prayer for injunctive writ must necessarily fail.

**THE PROVINCE ABANDONED ITS
MOTION WHEN IT AGREED TO SET
THE CASE FOR PRE-TRIAL
WITHOUT MOVING FOR THE
ISSUANCE OF THE TRO/WRIT OF
PRELIMINARY INJUNCTION, AT
THE EARLIEST OPPORTUNITY.**

32. During the 10 November 2023 hearing, all the parties were represented by their respective counsels, except for the DENR, who was not present. The Honorable Court already set the pre-trial/presentation of evidence for this case on 19 February 2024. All parties – including the Province – agreed to said setting.

33. If indeed there was urgency to prevent an irreparable injury through the issuance of a TRO/Writ of Preliminary Injunction, then the Province should have raised it at that time, or even earlier. Instead, the Province agreed to set the hearing for the main case on a later date.

⁸ *Id.*

34. The Province's silence and failure to move for the issuance of a TRO/Writ of Preliminary Injunction, assuming such prayer is meritorious, constitutes waiver or abandonment of said relief. As it happened, the Province failed to raise its motion at the earliest opportunity and is now attempting to "revive" the same as an afterthought.

35. To further bolster the fact that the instant Motion is a mere afterthought, the Province not only failed to allege any ground that would establish the urgency of the issuance of TRO/Writ of Preliminary Injunction, but it also failed to move for the setting of a hearing, in spite of the fact that a hearing is required by the Rules. Sections 4 and 5 of Rule 58 of the Revised Rules of Court state:

Sec. 4. Verified application and bond for preliminary injunction or temporary restraining order.

A preliminary injunction or temporary restraining order may be granted only when:

(a) The application in the action or proceeding is verified, and shows facts entitling the applicant to the relief demanded; and

(b) Unless exempted by the court, the applicant files with the court where the action or proceeding is pending, a bond executed to the party or person enjoined, in an amount to be fixed by the court, to the effect that the applicant will pay to such party or person all damages which he may sustain by reason of the injunction or temporary restraining order if the court should finally decide that the applicant was not entitled thereto. Upon approval of the requisite bond, a writ of preliminary injunction shall be issued.

(c) When an application for a writ of preliminary injunction or a temporary restraining order is included in a complaint or any initiatory pleading, the case, if filed in a multiple-sala court, shall be raffled only after notice to and in the presence of the adverse party or the person to be enjoined. In any event, such notice shall be preceded, or contemporaneously accompanied, by service of summons, together with a copy of the complaint or initiatory pleading and the applicant's affidavit and bond, upon the adverse party in the Philippines.

However, where the summons could not be served personally or by substituted service despite diligent efforts, or the adverse party is a resident of the Philippines temporarily absent therefrom or is a nonresident thereof, the requirement of prior or contemporaneous service of summons shall not apply.

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(d) The application for a temporary restraining order shall thereafter be acted upon only after all parties are heard in a summary hearing which shall be conducted within twenty-four (24) hours after the sheriff's return of service and/or the records are received by the branch selected by raffle and to which the records shall be transmitted immediately.

Sec. 5. Preliminary injunction not granted without notice; exception.

No preliminary injunction shall be granted without hearing and prior notice to the party or person sought to be enjoined. If it shall appear from facts shown by affidavits or by the verified application that great or irreparable injury would result to the applicant before the matter can be heard on notice, the court to which the application for preliminary injunction was made, may issue ex parte a temporary restraining order to be effective only for a period of twenty (20) days from service on the party or person sought to be enjoined, except as herein provided. Within the said twenty-day period, the court must order said party or person to show cause, at a specified time and place, why the injunction should not be granted, determine within the same period whether or not the preliminary injunction shall be granted, and accordingly issue the corresponding order.

However, and subject to the provisions of the preceding sections, if the matter is of extreme urgency and the applicant will suffer grave injustice and irreparable injury, the executive judge of a multiple-sala court or the presiding judge of a single-sala court may issue ex parte a temporary restraining order effective for only seventy-two (72) hours from issuance but he shall immediately comply with the provisions of the next preceding section as to service of summons and the documents to be served therewith. Thereafter, within the aforesaid seventy-two (72) hours, the judge before whom the case is pending shall conduct a summary hearing to determine whether the temporary restraining order shall be extended until the application for preliminary injunction can be heard. In no case shall the total period of effectivity of the temporary restraining order exceed twenty (20) days, including the original seventy-two hours provided herein.

In the event that the application for preliminary injunction is denied or not resolved within the said period, the temporary restraining order is deemed automatically vacated. The effectivity of a temporary restraining order is not extendible without need of any judicial declaration to that effect and no court shall have authority to extend or renew the same on the same ground for which it was issued.

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However, if issued by the Court of Appeals or a member thereof, the temporary restraining order shall be effective for sixty (60) days from service on the party or person sought to be enjoined. A restraining order issued by the Supreme Court or a member thereof shall be effective until further orders. (Emphasis supplied)

36. Although the Province adopted the original Complaint as well as the affidavits and documentary evidence of the Plaintiffs, the fact that the application for TRO/Writ of Preliminary Injunction was not set for hearing shows that the Motion is an afterthought. This is especially true since adopting Plaintiffs' affidavits is insufficient due to the PRA's lack of opportunity to cross-examine the witnesses in this case, as the record will show.

PRAYER

WHEREFORE, PRA respectfully prays that the Province of Palawan's Motion for the Resolution and Issuance of a Writ of Preliminary Injunction be **DENIED** for lack of merit.

Other equitable measures of relief are likewise prayed for.

Quezon City for Coron, Palawan, 15 December 2023.

OFFICE OF THE GOVERNMENT CORPORATE COUNSEL

Counsel for PRA

3rd Floor MWSS Admin. Building, Katipunan Road, Quezon City

Phone: +63(2)-7587-9803; Mobile: +63(917)-8735522

records@ogcc.gov.ph

ROGELIO V. QUEVEDO


Government Corporate Counsel

Roll of Attorneys 31495

IBP Life Member Roll 4393; 01/29/2003; Bulacan

MCLE Exemption VIII-OGCC003120; 09/05/2023

Comment/Opposition
BCT Trading & Construction et al. vs. Magallanes et al.
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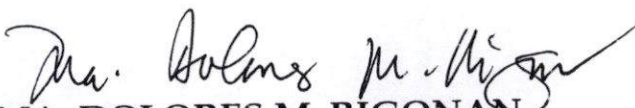

MARILYN G. ESTARIS

Deputy Government Corporate Counsel

Roll of Attorneys 42624

IBP Life Member Roll 6380; 1/10/07; Quezon City

MCLE Exemption VII-OGCC 002853; 2/16/21


MA. DOLORES M. RIGONAN

Assistant Government Corporate Counsel

Roll of Attorneys 36023

IBP Life Member Roll 06385; 11/08/08; Quezon City

MCLE Exemption VII-OGCC002860, 2/16/21


MARIA SUSANA BORRROMEO-GARCIA

Government Corporate Attorney

Roll of Attorneys 36759

IBP Life Member Roll 703220; 1/10/07, Quezon City

MCLE Compliance VII-0004719, 11/12/21


JENNY G. LIBUTAQUE

Government Corporate Attorney

Roll of Attorneys 58594

IBP Life Member Roll 09032; 4/07/10; RSM

MCLE Compliance VII-0006098, 11/23/21

Copy furnished:

ALAMPAY AND TAMASE LAW OFFICE

Counsel for the Plaintiffs

12th Floor, PDCP Bank Centre cor.

Rufino and Leviste Sts., Salcedo Village, Makati City

alampaytamase@gmail.com

RE 750 093 715 22
UPPO-AC
12-8-2023

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PROVINCIAL GOVERNMENT OF PALAWAN

Provincial Legal Office

Plaintiff-Intervenor

3rd Floor, Capitol Compound, Fernandez St.,
Barangay Tanglaw, Puerto Princesa City, Palawan
provinciallegaloffice.palawan@gmail.com

724 22

ROBERTO B. MAGALLANES

JOSE B. MAGALLANES

Defendants

Nueva Street, Brgy. Poblacion IV,
Coron, Palawan

738 22

**DEPARTMENT OF ENVIRONMENT &
NATURAL RESOURCES-MIMAROPA**

Defendant

1515 Roxas Blvd., Ermita, Manila
mimaroparegion@denr.gov.ph

741 22

**DEPARTMENT OF PUBLIC WORKS & HIGHWAYS-
MIMAROPA**

Defendant

790 Epifanio de Los Santos Avenue,
Diliman, Quezon City
pacanan.gerald@dpwh.gov.ph

755 22

**LOCAL GOVERNMENT OF CORON, PALAWAN
c/o OFFICE OF THE MAYOR**

Defendant

Municipal Hall of Coron, Palawan

769 22

UPPO-OC

12-18-2023

EXPLANATION

This Comment/Opposition is filed, and its copies served on the parties, by registered mail with return card due to time, distance, and manpower constraints. An electronic copy of this Comment/Opposition is further transmitted to this Honorable Court.


JENNY G. LIBUTAQUE

REPUBLIC OF THE PHILIPPINES
AFFIDAVIT OF SERVICE

I, **WELGIE C. FLORIA**, of the Office of the Government Corporate Counsel, with office address at 3rd Floor, MWSS Administration Building, Katipunan Avenue, Old Balara, Quezon City, after being duly sworn to, depose and say:

That on 18 December 2023, I served a copy of the following pleading/paper:

NATURE OF PLEADINGS/PAPER
"COMMENT/OPPOSITION"

In Civil Case CRN-1084 entitled "**BCT TRADING & CONST. ET AL., VS. ROBERTO B. MAGALLANES, ET AL.,**" pursuant to Section 3, 4, 5 and 10, Rule 13 of the Rules of Court, as follows:

By personal service to:

By Ordinary Mail to/Special Delivery to:
By Registered Mail to:

REGIONAL TRIAL COURT
Br. 163, Coron, Palawan

ALAMPAY AND TAMASE LAW OFFICE

**PROVINCIAL GOVERNMENT OF
PALAWAN**

ROBERTO B. MAGALLANES

**DEPARTMENT OF ENVIRONMENT &
NATURAL RESOURCES-MIMAROPA**

**DEPARTMENT OF PUBLIC WORKS &
HIGHWAYS-
MIMAROPA**

**LOCAL GOVERNMENT OF CORON,
PALAWAN c/o OFFICE OF THE MAYOR**

By delivery personally a copy to the party of
his/her attorney on _____ as show up
on p. _____.

By leaving a copy of in his/her office with
his/her clerk or with a person having charge
thereof on _____ as
shown on p. _____.

By delivery a copy of the Court/Tribunal/Office
on _____ shown on p. _____.

By depositing on _____ a copy in the
post office at _____ in a sealed envelope,
plainly addressed to the party or his/her attorney
at his/her office/residence with postage fully
paid and with instruction to the postmasters to
return the mail to the sender after ten (10) days if
undelivered.

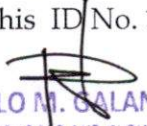
By depositing a copy on _____ in the
post office at _____ as evidences
by Registry Receipts(s) No. (s) _____ of
the addressee(s) and with instructions to the
postmaster to return the mail to sender after ten
(10) days if undelivered.

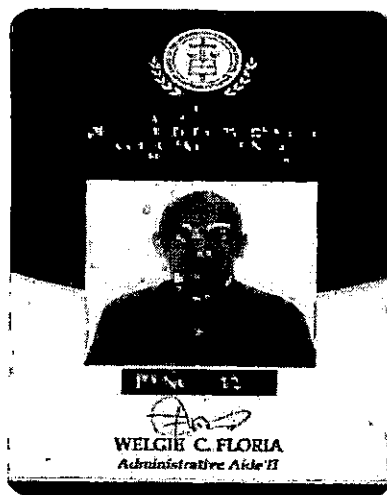
Quezon City, for Coron, Palawan, 18 December 2023.


WELGIE C. FLORIA
Affiant

SUBSCRIBED AND SWORN to before me this 18 December 2023, affiant personally appeared before me and exhibited to me his ID No. 123.

Doc. No. 216
Page No. 45
Book No. IV
Series of 2023.


ATTY. DANILO M. SALANG, JR., CPA
NOTARY PUBLIC FOR AND IN QUEZON CITY
3RD FLOOR, MWSS ADMINISTRATION BUILDING, KATIPUNAN,
BALARA, QUEZON CITY
ADM. MATTER NO. NP-526 (2023-2024), ROLL NO. 71806
IBP NO. 184810; 02-18-2022-Q.C. (FOR 2023)
PTR NO. 4804202; 06-21-2023-Q.C.
MCLE VII COMPLIANCE NO. 0017489; 05-10-2022
MY COMMISSION IS VALID UNTIL DECEMBER 31, 2024

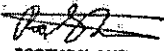


NAME: WELGIE C. FLORIA
ADDRESS: BLK 5 KAINGIN I ERGY PANSOL
QUEZON CITY
EMAIL: welgie.floria@ogcc.gov.ph

TIN: 161-833-336
OGS POLICY NO.: LP02004206062
OGS EP NO.: 2804206062
PHILHEALTH: 70500944882
PAGIBIG: 7022811704
BLOOD TYPE: O
BIRTHDATE: AUGUST 23, 1972

Please notify in case of emergency:
ERNALYN G. FLORIA
09153174699

In case of loss, please return to OGCC


ROGELIO V. QUEVEDO
Government Corporate Counsel

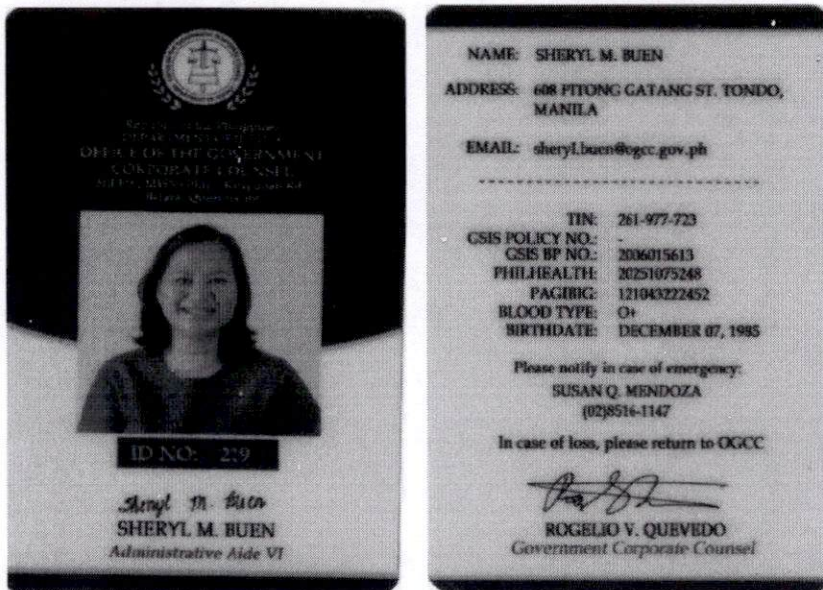
Republic of the Philippines)

Quezon City)

I, **SHERYL M. BUEN**, hereby declare that the document/s (and annexes thereof) hereto submitted electronically in accordance with the Guidelines on Submission of Electronic Copies of Pleadings and other Court Submissions Being Filed Before the Lower Courts is/are complete and true copy/ies of the document/s (and accompanying documents) filed by accredited courier with the Regional Trial Court, Branch 163, Coron, Palawan.

Sheryl M. Buen
SHERYL M. BUEN
Administrative Aide VI
Date: 18 December 2023

SUBSCRIBED AND SWORN TO before me this 18th day of December 2023, affiant exhibiting his/her competent evidence of identity: OGCC ID No. 219.



Doc. 217;
Page 45;
Book IV;
Series of 2023.

[Signature]
ATTY. DANILO M. GALANG, JR., CPA
NOTARY PUBLIC FOR AND IN QUEZON CITY
3RD FLOOR, MWSS ADMINISTRATION BUILDING, KATIPUNAN,
BALARA, QUEZON CITY
ADM. MATTER NO. NP-526 (2023-2024), ROLL NO. 71806
IBP NO. 184810; 02-18-2022-Q.C. (FOR 2023)
PTR NO. 4804202; 06-21-2023-Q.C.
MCLE VII COMPLIANCE NO. 0017489; 05-10-2022
MY COMMISSION IS VALID UNTIL DECEMBER 31, 2024