

OFFICE COPY

Republic of the Philippines
Department of Environment and Natural Resources
MIMAROPA Region
PROVINCIAL ENVIRONMENT AND NATURAL
RESOURCES OFFICE
Brgy. Sta. Monica, Puerto Princesa City, Palawan

IN RE: CANCELLATION OF
KATIBAYAN NG ORIHINAL NA
TITULO (KOT) BLG. 2015000225
IN THE NAME OF BABERLYN D.
GOMEZ, KOT BLG. 2015000222
AND KOT BLG. 2015000223, BOTH
IN THE NAME OF NOEL TAMPE,
ALL LOCATED AT CADLAO
ISLAND, BARANGAY BUENA
SUERTE, EL NIDO, PALAWAN

DENR CASE NO. _____

RE 781 361 461 ZZ
Registered Mail
Post Office _____
Number/Package No. _____
Dated on MAY 29 2023
I hereby acknowledge the receipt of this receipt for reference in case of inquiry
Postmaster/Teller _____

X ----- X

MANIFESTATION

Complainant **Ten Knots Philippines, Inc. ("TKPI")**, by counsel, respectfully states:

1. On 22 May 2023, TKPI received a letter dated 16 May 2023 from the Department of Environment and Natural Resources MIMAROPA Region ("DENR MIMAROPA") referring to documents designated as Annexes "A" to "KK" that it received from TKPI on 30 March 2023 by registered mail without a "covering letter specifying the purpose of transmitting ... the same".

2. TKPI respectfully clarifies that these documents are the annexes of its *Position Paper* dated 23 March 2023 ("Position Paper") that TKPI furnished to the DENR MIMAROPA by registered mail and electronic mail.

3. In furnishing the DENR MIMAROPA with a copy of the Position Paper by registered mail, the same had to be sent in tranches to fit the mailing envelopes. In so doing, the mailing envelope containing body of the Position Paper may have been separated from the mailing envelope containing its annexes.

4. TKPI hereby furnished the DENR MIMAROPA with a physical copy of the Position Paper, together with its complete

annexes, by way of personal service. Notably, the DENR MIMAROPA acknowledged receipt of the Position Paper (with a complete set of its annexes) on 24 March 2023 through electronic mail.¹

RESPECTFULLY SUBMITTED.

Taguig for Puerto Princesa City, 29 May 2023.

ANGARA ABELLO CONCEPCION REGALA & CRUZ

Counsel for Ten Knots Philippines, Inc.
22nd Floor, ACCRALAW Tower
2nd Avenue corner 30th Street, Crescent Park West
Bonifacio Global City, 1635 Taguig
Telephone No. (632) 8830-8000
accra@accralaw.com

By:



SALVADOR L. PEÑA

PTR No. A-5797579; 01/11/2023; Taguig City
IBP No. 181471; 01/06/2023; Rizal (RSM)
Roll No. 35402
MCLE Compliance No. VII-0004786; 11/23/21
slpena@accralaw.com



CHRYSILLA CARISSA P. BAUTISTA

PTR No. A-5800892; 01/11/2023; Taguig City
IBP No. 181491; 01/06/2023; Quezon City
Roll No. 46309
MCLE Exemption No. VII-Acad003161; 11/26/21
cpbautista@accralaw.com



CHRISTOPHER LOUIE D. OCAMPO

PTR No. A-5801930; 01/11/2023; Taguig City
IBP No. 249162; 01/06/2023; Makati City
Roll No. 62546
MCLE Compliance No. VII-0010324; 02/16/22
cdocampo@accralaw.com

¹ A copy of the proof of service by electronic mail is attached hereto as Annex "A", and made an integral part hereof.


KRIS SARAH M. JERUTA

PTR No. A-5797280; 01/11/2023; Taguig City

IBP No. 249229; 01/06/2023; Makati City

Roll No. 75274

MCLE Compliance No. VII-0004861; 11/26/21

kmjeruta@accralaw.com


MIGUEL RICO E. DE GUZMAN

PTR No. A-57976214; 01/11/2023; Taguig City

IBP No. 249214; 01/06/2023; Makati City

Roll No. 75653

MCLE Compliance No. VII-0027608; 04/03/23

medeguzman@accralaw.com


MARIBEL NICOLE DG. LOPEZ

PTR No. A-5797620; 01/11/2023; Taguig City

IBP No. 249231; 01/06/2023; Makati City

Roll No. 81891

MCLE Compliance No. NA; (Admitted on May 2022)

mdlopez@accralaw.com

Copy furnished:

**DEPARTMENT OF ENVIRONMENT AND NATURAL
RESOURCES**

MIMAROPA Region IV

DENR by the Bay, 1515 L&S Building

Roxas Boulevard, Manila

mimaroparegion@denr.gov.ph


ATTY. CHE ANN MAE G. FLORES

Counsel for Baberlyn D. Gomez

Brgy. Sta. Monica

Puerto Princesa City, Palawan

camgflores2018@gmail.com

DENR MIMAROPA RECORDS SECTION RECEIVED	
MAY 29 2023	
<input type="checkbox"/> INCOMING	<input type="checkbox"/> OUTGOING
BY: 	DAYS NO. _____
TIME: 3:21pm	

R. R. No.: DE-181361 49678

Date: 29 MAY 2023

BELLO VALDEZ & FERNANDEZ

Attention: Atty. Roberto Joaquin S. Atanacio

Counsel for Significo Vista Ventures, Inc.

17TH floor, Robinsons Equitable Tower

4 ADB Avenue cor. P. Poveda Drive

Ortigas Center, Pasig City 1605

info@jglawph.com

R. R. No.: DE-181361 4828

Date: 29 MAY 2023

**COMMUNITY ENVIRONMENT AND
NATURAL RESOURCES OFFICE**

Attention: Engr. Alan L. Valle
DENR Region IV - MIMAROPA
National Highway, Poblacion
Taytay, Palawan 5312
cenrotaytay@denr.gov.ph

R. R. No.: RE-181 361 4790
Date: 29 MAY 2023

**EL NIDO-TAYTAY MANAGED
RESOURCE PROTECTED AREA**

Attention: Mildred A. Suza
Protected Area Superintendent
Calle Real, Barangay Masagana
El Nido, Palawan 5313
denrpao_elnidopal@yahoo.com
entmrpa@gmail.com

R. R. No.: RE-181 361 4650
Date: 29 MAY 2023

In Re: Cancellation of KOT Blg. 2015000225 in the Name of Baberlyn Gomez, KOT Blg. 2015000222 and KOT Blg. 2015000223, Both in the Name of Noel Tampe, All Located at Cadlao Island, Barangay Buena Suerte, El Nido, Palawan- Position Paper dtd. 23 Ma...

From: Miguel Rico E. De Guzman <mdeguzman@accralaw.com>
Date: Thu, Mar 23, 2023 at 8:12 PM
Subject: In Re: Cancellation of KOT Blg. 2015000225 in the Name of Baberlyn Gomez, KOT Blg. 2015000222 and KOT Blg. 2015000223, Both in the Name of Noel Tampe, All Located at Cadlao Island, Barangay Buena Suerte, El Nido, Palawan- Position Paper dtd. 23 March 2023
To: mimaroparegion@denr.gov.ph <mimaroparegion@denr.gov.ph>; ceprtayday@denr.gov.ph <ceprtayday@denr.gov.ph>; ceprtayday@denr.gov.ph <ceprtayday@denr.gov.ph>; denroao_elnidopal@yahoo.com <denroao_elnidopal@yahoo.com>; enrtrco@gmail.com <enrtrco@gmail.com>
Cc: Salvador L. Pena <sloena@accralaw.com>; Chrystila Carissa P. Bautista <cbautista@accralaw.com>; Atty. Ocampo, Christopher Louie D. <cdocampo@accralaw.com>; Kris Sarah M. Jenuita <kajenuita@accralaw.com>; Maribel Nicole D. Lopez <mlopez@accralaw.com>; jenogcincos@gmail.com <jenogcincos@gmail.com>

DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES
MIMAROPA Region IV
DENR by the Bay, 1515 L&S Bldg.
Roxas Boulevard, Manila
mimaroparegion@denr.gov.ph

COMMUNITY ENVIRONMENT AND
NATURAL RESOURCES OFFICE
Attention: Engr. Alan L. Valle
DENR Region IV – MIMAROPA
National Highway, Poblacion
Taytay, Palawan 5312
ceprtayday@denr.gov.ph

EL NIDO-TAYTAY MANAGED
RESOURCE PROTECTED AREA
Attention: Mildred A. Soza
Protected Area Superintendent
Calle Real, Barangay Moagana
El Nido, Palawan 5313
denroao_elnidopal@yahoo.com
enrtrco@gmail.com

Greetings!

We hereby serve the attached copy of the *Position Paper* dated 23 March 2023 for Ten Knots Philippines, Inc. This was likewise served by registered mail today.

Kindly acknowledge receipt of this email and its attachment.

Thank you for your kind attention to this matter.

Best regards,
ANGARA ABELLO CONCEPCION REGALA & CRUZ LAW OFFICES
Counsel for Ten Knots Philippines, Inc.

Miguel Rico E. De Guzman
Associate
Litigation and Dispute Resolution Department
ANGARA ABELLO CONCEPCION REGALA & CRUZ LAW OFFICES
22/F ACCRALAW Tower,
2nd Avenue cor. 30th Street,
Crescent Park West, Bonifacio Global City,
1635 Taguig, Metro Manila, Philippines
Tel. No. +63 2 8830-8000 / Facsimile No. +63 2 8403-7007

In Re: Cancellation of KOT Blg. 2015000225 in the Name of Baberlyn Gomez, KOT Blg. 2015000222 and KOT Blg. 2015000223, Both in the Name of Noel Tampe, All Located at Cadlao Island, Barangay Buena Suerte, El Nido, Palawan- Position Paper dtd. 23 Ma...

From: DENR Mimaropa Region <mimaroparegion@denr.gov.ph>
Sent: Friday, March 24, 2023 8:50:16 AM
To: MIMAROPA - Legal <denr4blegal@gmail.com>; Miguel Rico E. De Guzman <medeguzman@accralaw.com>
Subject: Fwd: In Re: Cancellation of KOT Blg. 2015000225 in the Name of Baberlyn Gomez, KOT Blg. 2015000222 and KOT Blg. 2015000223, Both in the Name of Noel Tampe, All Located at Cadlao Island, Barangay Buena Suerte, El Nido, Palawan- Position Paper dtd. 23 Ma...

Good day!

This is to acknowledge receipt of your email.
Your concern was immediately forwarded to the **Legal Division** for review and appropriate action

For other inquiries/follow-ups, you may reach them directly at their email address:
denr4blegal@gmail.com

Please also be informed that your concern has been assigned with Document Tracking Number **E-2023-105502**.

To track the status of your concern, please provide the number above for ease of reference.

Thank you and keep safe.

ROBERT T. PANTI
Database Management Officer
Records Section - DENR MIMAROPA

REPUBLIC OF THE PHILIPPINES)
TAGUIG CITY)S.S.

AFFIDAVIT OF SERVICE

I, **JOY G. LORENZO**, as Messenger Clerk of **ANGARA ABELLO CONCEPCION REGALA & CRUZ LAW OFFICES** with office address at the 22/F ACCRALAW Tower, 2nd Avenue corner 30th St., Crescent Part West, Bonifacio Global City, 1635 Taguig, Metro Manila, after being duly sworn, depose and say:

That on 29 May 2023, I served a copy of the **MANIFESTATION** in the case entitled "IN RE: CANCELLATION OF KATIBAYAN NG ORIHINAL NA TITULO (KOT) BLG. 2015000225 IN THE NAME OF BABERLYN D. GOMEZ, KOT BLG. 2015000222 AND KOT BLG. 2015000223, BOTH IN THE NAME OF NOEL TAMPE, ALL LOCATED AT CADLAO ISLAND, BARANGAY BUENA SUERTE, EL NIDO, PALAWAN, docketed as DENR CASE NO. _____, in the Department of Environment and Natural Resources, MIMAROPA Region, PROVINCIAL ENVIRONMENT AND NATURAL RESOURCES OFFICE, Brgy. Sta. Monica, Puerto Princesa City, Palawan, pursuant to Sections 5, 6, 7, 11 and 13, Rule 13 of the Rules of Court as follows:

Registered Mail:

ATTY. CHE ANN MAE G. FLORES

Counsel for Baberlyn D. Gomez
Brgy. Sta. Monica
Puerto Princesa City, Palawan
camgflores2018@gmail.com

RE 781 361 496 ZZ



BELLO VALDEZ & FERNANDEZ

Attention: Atty. Roberto Joaquin S. Atanacio
Counsel for Significo Vista Ventures, Inc.
17TH floor, Robinsons Equitable Tower
4 ADB Avenue cor. P. Poveda Drive
Ortigas Center, Pasig City 1605
info@jglawph.com

RE 781 361 482 ZZ



**COMMUNITY ENVIRONMENT AND
NATURAL RESOURCES OFFICE**

Attention: Engr. Alan L. Valle
DENR Region IV - MIMAROPA
National Highway, Poblacion
Taytay, Palawan 5312
cenrotaytay@denr.gov.ph

RE 781 361 479 ZZ



**EL NIDO-TAYTAY MANAGED
RESOURCE PROTECTED AREA**

Attention: Mildred A. Suza
Protected Area Superintendent
Calle Real, Barangay Masagana
El Nido, Palawan 5313
denrpao_elnidopal@yahoo.com
entmrpa@gmail.com

RE 781 361 465 ZZ



by depositing a copy thereof on 29 May 2023 at the post office of MANILA in a sealed envelope plainly addressed to him, with postage fully prepaid, as evidenced by Registry Receipt No. _____ attached hereto after the name of the addressee, and with instructions to the postmaster to return the mail to the sender after ten (10) days if undelivered.


JOY G. LORENZO
Affiant

SUBSCRIBED AND SWORN to before me this 29th day of May 2023, at Taguig City Philippines, affiant who is personally known to me, exhibiting to me the following:

Affiant	Competent Evidence of Identity		
		Type of ID	ID Number and Expiry Date (if applicable)
JOY G. LORENZO	1	SSS ID	No. 33-6030868-5
	2	HDMF Transaction Card ID	No. 0003-802081-05

Doc. No. 217;
Page No. 44;
Book No. I;
Series of 2023.




ATTY. ROSLYN BIANCA R. MANGASER
Notary Public for Taguig City
Until December 31, 2023
PTR No. A-5797282; January 11, 2023 – Taguig City
IBP No. 249235; January 06, 2023 – PPLM
Appointment / Commission No. 91 (2022-2023)
Roll No. 71841
Angara Abello Concepcion Regala & Cruz Law Offices
22/F ACCRALAW Tower
2nd Avenue corner 30th St., Crescent Park West,
Bonifacio Global City, 1635 Taguig, Metro Manila
MCLE Compliance No. VII-0004852; November 26, 2021