BA-ALAN LAW OFFICE

National Highway, So. Bagto, Brgy. San Nicolas, Roxas, Palawan

0 5 AUG 2022

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July 13, 2022

The ASSISTANT REGIONAL DIRECTOR FOR TECHNICAL SERVICES Department of Environment & Natural Resources Region 4B-MIMAROPA

1515, L & S Bldg., Roxas Blvd. Ermita, Manila



In behalf of my client, LAURIANA H. DALOJO, I am respectfully manifest our <u>opposition</u> <u>for the approval</u> of CONSOLIDATED/SUBDIVISION PLAN OF LAND of Lots 5438, 5439, 5453 to 5459, 5462 & 5470, Cad 862-D, Roxas Cadastre, under Ccs-4B-000164, as surveyed for Brgy. Government of Mendoza, over these tracks of land located in Brgy. Mendoza, Roxas, Palawan for reason that the inclusion of the land of my said client in this CONSOLIDATED/SUBDIVISION PLAN is patently erroneous and without the consent and conformity of said client, which eventually laid to various civil case involving lot owners and claimants.

Further, in so far as my client is concern, a case for that matter is now litigated in the Municipal Circuit Trial Court of Roxas-Cagayancillo, Roxas, Palawan involving the said land, particularly, Civil Case No. 274, entitled "Heirs of Emelio Madeja, plaintiffs vs. Lauriana Dalojo, defendant for Recovery of Possession" and Civil Case No. 259, entitled "Lauriana H. Dalojo, plaintiff, vs. Mary Grace Ejedia, et. al., defendants".

Hence, pending the finality of the said cases, please <u>withhold any action and/or disapprove</u> the said CONSOLIDATED/SUBDIVISION PLAN OF LAND in order to curtail any injustice on the parties on those cases.

Thank you and more power.

ATTY. ORLANDO A. BA-ALAN Counsel for Lauriana H. Dalojo