

0 4 JUL 2022

DATS NO.

I OUTGOING

June 22, 2022

MEMORANDUM

FOR

The Regional Executive Director

DENR, MIMAROPA, 1515 L & S Building

Roxas Blvd., Ermita, Manila

Attention

The Chief, Legal Division

FROM

The Provincial Environment and

Natural Resources Officer

SUBJECT

WRITTEN ENTRY OF APPEARANCE WITH MOTION TO WITHDRAW THE MOTION FOR RECONSIDERATION

EX ABUDANTI AD CAUTELAM

Furnished for information is the Written Entry of Appearance with Motion to withdraw the Motion for reconsideration dated April 11, 2022 submitted by the Petitioner's council Atty. Julie May C. Taguiam for LRC Case No. 3203 particularly the Petition for issuance of Certificate of Title in the name of Bureau of Corrections.

Copy furnished:

Atty. Julie May C. Taguiam RTC National Capital Judicial Region Branch 48- Puerto Princesa City

TSD-RPS DRN 2022-5198/lmo

FELIZARDO B. CAYATOC

PALAVIAN BY: DATE: 2 8 2022 20 - 1413

Sta. Monica, Puerto Princesa City Telefax (048) 433-5638 email add:<u>denrpalawan@gmail.com</u>

Republic of the Philippines REGIONAL TRIAL COURT National Capital Judicial Region BRANCH 48

Puerto Prinsesa City, Palawan



IN RE: PETITION FOR ISSUANCE CERTIFICATE OF TITLE IN THE NAME OF BUREAU OF CORRECTIONS,

LRC CASE NO. 3203

BUREAU OF CORRECTIONS herein represented by ENGR. AL CIR JUAN R. RAÑOSA, AND ATTY. RANDY G SERRANO

	Petitioner.
X	X

WRITTEN ENTRY OF APPEARANCE WITH MOTION TO WITHDRAW THE MOTION FOR RECONSIDERATION EX ABUDANTI AD CAUTELAM

PETITIONER, through counsel unto the Honorable Court, most respectfully alleges:

- 1. Petitioner, Bureau of Corrections, through the undersigned, respectfully manifests that Atty. Randy Serrano was relieved from his office by virtue of his resignation last February 17, 2022. Attached hereto is a copy of the resignation letter and the order relieving him of his duties marked as **Annex "A"** and "**A-1"** respectively;
- 2. As such, Atty. Serrano filed his notice of withdrawal as counsel for the petitioner dated February 23, 2022. Attached hereto is the copy of the notice of withdrawal marked as **Annex "B"**;
- 3. On February 28, 2022, the petitioner received a Court Order by e-mail granting the notice of withdrawal of appearance of Atty. Randy G. Serrano as counsel for the petitioner in this case. Attached hereto is the printed copy of the email marked as **Annex** "C";

- 4. The petitioner intends to re-file the case after complying with the procedural and substantive requirements of the existing laws and rules;
- 5. The legal office of the Bureau of Corrections is still in the process of securing certain documents in support of the refiling of the petition and in compliance with the existing laws and rules;
- 6. In the interest of justice, the undersigned most respectfully beg the Honorable Court for the withdrawal of the motion for reconsideration and dismiss of the petition without prejudice to the refiling of the main action/petition as well as the cancellation of the scheduled hearing on the motion on April 18, 2022.

PRAYER

WHEREFORE, it is most respectfully prayed of the Honorable Court that this Motion be granted, and the motion for reconsideration be declared withdrawn and the Petition be dismissed without prejudice to the filing the said action.

Petitioner prays for such other reliefs and remedies available under the premises.

11 April 2022, Muntinlupa City, Metro Manila Philippines.

ATTY. JULIE MAY C. TAGUIAM

Petitioner's Counsel

IBP No. 199098/ 01-13-22/IBP Manila II PTR No. 415992/ 02-23-22/Muntinlupa

Roll No. 71597

MCLE COMPLIANCE No. VII- 0000174

Issued on February 20, 2019

NBP Reservation, Barangay Poblacion, Muntinlupa City 1776

Email: juliemay@taguiam.com/ Bucor.bbc@gmail.com

Tel. Nos. 82309465; 09175597006

ATTY. MYKO R. MENDOZA

Roll of Attorneys No. 75306 PTR No. 9031172; 3 Jan 2022; Ilocos Norte IBP No. 1909407; 6 Jan 2022; Ilocos Norte MCLE Compliance No. VII-0009403 Mobile No. 09054148039

Email add: mykomendoza2@gmail.com

EXPLANATION

The foregoing motion is served through mail and email due to distance and lack of personnel to effect personal service during this time of pandemic.

ATTY. JULIE MAY'C. FAGUIAM

ATTY. MYKOF. MENDOZA

Copy furnished:

Office of the Solicitor General 134 Amorsolo Street, Makati City

Registry of Deeds of the Province of Palawan Registry of Deeds Bldg., City Hall Compound, Sta. Monica, Puerto Prinsesa City, Palawan

Department of Environment and Natural Resources Sta. Monica, Puerto Prinsesa City, Palawan





Republic of the Philippines DEPARTMENT OF JUSTICE **BUREAU OF CORRECTIONS**

BUCOR BUSINESS CENTER
NBP Reservation, Muntinlupa City, Philippines, 1776





February 17, 2022

USEC. GERALD Q. BANTAG Director General **Bureau of Corrections**

Dear Sir,

Greetings!

This is to respectfully tender my irrevocable resignation as ATTORNEY III in the Bureau of Corrections and my designation as Director of BuCor Business Center for family reasons.

Thank you for the opportunity of serving the government.

Respectfully yours,

ATTY. RANDY G. SERRANO

SUBSCRIBED AND SWORN to before me this 8 FEB 2022 day of February, 2022, in Muntinlupa City, Metro Manila, Philippines. Affiant exhibiting to me his BuCor ID No. 120-0121 as valid proof of his identity.

Doc. No. ; 219 Page No.; 44 Book No.; VI Series of 2022. ATTY, EARLES N.H. DEL ROSARIO
Notary Public and a Calescan City
Notariat CNICTARY, Public and DEC 31, 2022
No. 18 Plaza Ren. Authorion Calescan City
IBP O.R. No. 1827/2 - 01030/12 Pasing City
PTR No. 9637/95 - 00100/17 Calescan City
MCLE Completion Res. And Use 169
ROLL No. 73914



Republic of the Philippines

NATIONAL HEADQUARTERS

NBP Reservation, Muntinlupa City, Philippines, 17: Telephone No. +632-88500110/85568016

ANNEX 17 FEB 2022

BUCORDA-SPECIAL ORDER NUMBERS 2022 - 0145

BUREAU OF CORRECTIONS
OFFICIAL DOCUMENT
CMS, ADMINISTRATIVE DIVISION

Certified by: COI VISTE

Date: 2-17-ad Time: 2:30pm

- 1. C/CSUPT JULIE MAY C TAGUIAM, in the interest of the service and in addition to your present duties and responsibilities as the Director, Directorate for External Relations (DER) and Chief, Public Information Office (PIO), you are hereby designated as Director, BuCor Business Center (BBC).
- ATTY RANDY G SERRANO, in the interest of the service, you are relieved from your present duties and responsibilities as Director, BBC.
 - This Order takes effect immediately.

BY THE AUTHORITY OF THE DIRECTOR GENERAL, BUCOR:

JOHN PAUL O SANTOS, Ph.D., LL.B., CSP CT/CSUPT JMP

Acting Director Directorate for Administration

KSM/PmldbdFeb2022

1ea - ODG/DDGA/DDGG/DDGR 1ea - DA/HRD/DER/BBC/PIO

- Records

Republic of the Philippines

REGIONAL TRIAL COURT

National Capital Judicial Region

BRANCH 48

Puerto Prinsesa City, Palawan

IN RE: PETITION FOR ISSUANCE CERTIFICATE OF TITLE IN THE NAME OF BUREAU OF CORRECTIONS,

LRC CASE NO. 3203

BUREAU OF CORRECTIONS herein represented by ENGR. AL CIR JUAN R. RAÑOSA, AND ATTY. RANDY G SERRANO

Petitioner. X-----X

NOTICE OF WITHDRAWAL OF APPEARANCE

The undersigned counsel unto this Honorable Court, most respectfully gives notice of his withdrawal of appearance as counsel for petitioner **BUREAU OF CORRECTIONS** in the above-captioned case due to the former's resignation from Bureau of Corrections,

It is hereby requested that all pleadings, notices, orders and other papers relative to said case be henceforth served directly to Atty. Julie May C. Taguiam who will handle this case at the same address.

Attached is a copy of Notarized Resignation Letter dated February 17, 2022.

RESPECTFULLY SUBMITTED.

February 23, 2022, City of Caloocan

-916

ATTY. RANDY G. SERRANO

Petitioner's Counsel
IBP No. 196508/01-05-2022/ CALMANA
PTR No. 0659492/01-05-2022/ Caloocan City
Roll. No. 52213
MCLE COMPLIANCE No. VI-0012039
Issued on September 7, 2018

Email: serranoerispelawoffice@gmail.com
Tel. Nos. 5310-9978

EXPLANATION

The foregoing notice was served through registered mail due to distance and lack of personnel to effect personal service.

RANDY G. SERRANO

COPY FURNISHED:

Atty. Julie May C. Taguiam
Director of BuCor Business Center(BBC)

NBP Reservation, Barangay Poblacion, Muntinlupa City 1776

Email: <u>Bucor.bbc@gtmail.com</u>
Tel. Nos.82309465; 09257608820

Office of the Solicitor General

134 Amorsolo St., Legaspi Village Makati City

Email: docket@osg.gov.ph

ANNEX C

Republic of the Philippines
REGIONAL TRIAL COURT OF PALAWAN
AND PUERTO PRINCESA CITY
Fourth Judicial Region
BRANCH 48
Puerto Princesa City

IN RE: PETITION FOR ISSUANCE CERTIFICATE OF TITLE IN THE NAME OF BUREAU OF CORRECTIONS,

LRC CASE NO. 3203

BUREAU OF CORRECTIONS HEREIN REPRESENTED BY ENGR. AL CIR JUAN R. RANOSA AND ATTY. RANDY G. SERRANO,

Petitioner,

X----X

ORDER

The notice of withdrawal of appearance of Atty. Randy G. Serrano, as counsel for the petitioner in this case, on the ground therein stated, is noted and granted.

SO ORDERED.

Given this 28th day of February, 2022, at the Hall of Justice, Sta. Monica, Puerto Princesa City.

LEAH E. DE LOS REYES-BAGUYO Judge

Copy furnished:

1. Atty. Randy G. Serrano 2. Atty. Julie May C. Taguiam LERB/rmt