APR 12 2023

## REPUBLIC OF THE PHILIPPINES INCOMING OUTGOING. REGIONAL TRIAL COURT BY: \_\_\_\_\_ DATS NO.\_\_\_

FOURTH JUDICIAL REGION BRANCH 163

CORON, PALAWAN
Email: <a href="mailto:rtc2cnp163@judiciary.gov.ph">rtc2cnp163@judiciary.gov.ph</a>

Contact No.: 0926-658-3068

# BCT TRADING AND CONSTRUCTION and 428 HI-TECH GROUP, INC., Plaintiffs,

- versus -

CIVIL CASE No. CRN-1084

TIME:

For: Injunction and Damages

ROBERTO B. MAGALLANES and JOSE B. MAGALLANES, Jr., Styling themselves as "SAGIP CORON PALAWAN", PHILIPPINE RECLAMATION AUTHORITY, DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES – MIMAROPA, DEPARTMENT OF PUBLIC WORKS AND HIGHWAYS – MIMAROPA, AND THE LOCAL GOVERNMENT OF CORON, PALAWAN,

Defendants.

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### MOTION FOR ADDITIONAL TIME TO FILE POSITION PAPER

PLAINTIFFS, by counsel, unto this Honorable Court respectfully states:

- 1. In its Motion for Additional Time to File Position Paper, the PRA requested that it be given an additional period of at least 20 days from the deadline on 11 April 2023, or until **01 May 2023**, within which to file its Position Paper.
- 2. In view of the foregoing, and in order to make the submission of the parties' respective Position Papers

simultaneous, plaintiffs respectfully move that the submission of the Position Papers for all the parties be moved to **01 May 2023**.

#### RELIEFS

WHEREFORE, premises considered, plaintiffs respectfully pray that this Honorable Court issue an Order setting a simultaneous deadline for the filing of the respective Position Papers of all the parties on **01 May 2023**.

Other reliefs just and equitable are likewise prayed for.

Makati City, for Coron, Palawan, 04 April 2023.

#### ALAMPAY AND TAMASE LAW OFFICE

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By:

#### EMMANUEL P.J. TAMASE

PTR No. 9577851 01-12-2023 Makati City IBP No. 249336 01-09-2023 Quezon City Roll No. 33677 (1985) MCLE Compliance No. VII-0016044 4-21-2022

GWYN GARETH T. MARIANO

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#### **COPY FURNISHED**

#### Atty. SHEILA F. SAN DIEGO

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#### OFFICE OF THE GOVERNMENT CORPORATE COUNSEL

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## DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES (DENR MIMAROPA)

1515 Roxas Blvd., Ermita, 1000 Manila

#### LOCAL GOVERNMENT OF CORON PALAWAN

Office of the Mayor Municipal Hall, Coron, Palawan

#### **EXPLANATION**

This is to certify that prior to the filing of the foregoing COMMENT with this Honorable Court through electronic mail and registered mail, copies of the same would already have been served by personal service as well as electronic mail upon counsels for defendants Roberto B. Magallanes and Jose B. Magallanes, Jr., by registered mail and electronic mail upon the counsel for PRA, and via registered mail upon the other parties. This mode of **filing and service** were resorted to in view of the distances involved, manpower limitation, and time constraints. It is not in any way intended to delay these proceedings.

GWYN GARETH T. MARIANO

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