

REPUBLIC OF THE PHILIPPINES
REGIONAL TRIAL COURT
Fourth Judicial Region
Branch 43, Roxas, Mindoro Oriental
rtc2rxm043@judiciary.gov.ph

**NOYAD ABNAY LAPAD,
BONGBONG POYPOY GUARDIAN,
LORENA ABNAY POYPOY, DANNY
ABNAY POYPOY, PIPIN PURMA
LAPAD, LEAH POYPOY
GUARDIAN, SALOME POYPOY
GUARDIAN, PINKY ABNAY
POYPOY, LILOY PURMA,
NANETTE PURMA MALIGALIG,
BENJAMIN PURMA INLANGAN,
HULYAN AWANG, MAHANAY
ABNAY BUSAW AND ALL OTHER
HEIRS OF ABNAY AND MASID
AND ALL HANUNUO-MANGYAN
OCCUPANTS OF SITIO KULASI,
BRGY. CABALWA, MANSALAY,
ORIENTAL MINDORO AND ALL
PERSONS CLAIMING RIGHTS
UNDER THEM,**

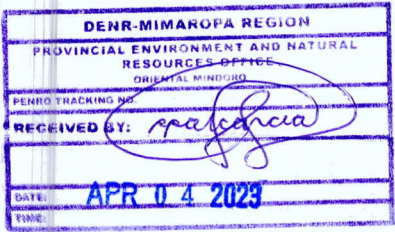
Plaintiffs,

- versus -

**ALFONSO CUSI and/or PATRICIA
C. RAMOS and/or JACOB S. CUSI
and/or MARLON C. ESTRELLA
AND ALL OTHER PERSONS
ACTING FOR AND IN BEHALF OF
THE NAMED DEFENDANTS, Doing
Business Under the Name and
Style "STARLITE HOLDINGS,
INC.", PAZ G. PANOPIO DE
VILLA, THE REGISTRAR OF
DEEDS FOR THE PROVINCE OF
ORIENTAL MINDORO, THE
OFFICER-IN-CHARGE OF THE
DEPARTMENT OF ENVIRONMENT
AND NATURAL RESOURCES -
ENVIRONMENTAL MANAGEMENT
BUREAU, REGION IV-B,**

Defendants,

X-----X



Civil Case No. C-707
For: **Confirmation of
Native Title,
Reconveyance and
Cancellation of Title**
pursuant to Section 8 (b)
of Republic Act No. 8371,
otherwise known as "The
Indigenous Peoples Rights
Act", **Damages** Arising
from Violation of Section
7 (a), (b), (c) and Section
10 of R.A. 8371 and
Presidential Decree (PD)
No. 1586, Establishing an
Environmental Impact
Statement System
Including Other
Environmental Related
Measures and for Other
Purposes, **with Prayer
for Temporary
Environmental
Protection Order
(TEPO), Temporary
Restraining Order
(TRO) and Writ of
Preliminary Injunction**

MOTION FOR EXTENSION OF TIME TO FILE ANSWER

The PUBLIC DEFENDANTS **DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES (DENR) AND ENVIRONMENTAL MANAGEMENT BUREAU (EMB), REGION IV-B**, through the **Office of the Solicitor General (OSG)**, to this Honorable Court, respectfully states that:

1. On 22 February 2023, the EMB endorsed the Summons dated 17 February 2023 with a copy of the complaint, requiring the public defendants to answer the Plaintiffs' Complaint within fifteen (15) days from notice.

2. Considering that the aforesaid copy of the complaint was just recently endorsed to the OSG, the undersigned State Solicitor needs more time to study the complaint and review related documents to prepare the Answer. Considering further the heavy workload of the undersigned Solicitor in other equally important cases, said Answer may not be finished, much less filed, on or before its due date.

3. This Motion is filed not to delay the early disposition of this case but solely for the foregoing reasons.

PRAYER

WHEREFORE, it is respectfully prayed that OSG be granted an extension of thirty (30) days from 9 March 2023, or until 8 April 2023, within which to file the required Answer.

Other reliefs just and equitable under the premises are likewise prayed for.

Makati City for Roxas, Oriental Mindoro,
9 March 2023.

MENARDO I. GUEVARRA

Solicitor General

Roll of Attorneys No. 33957

IBP No. 292878; 1-09-2023; Bulacan

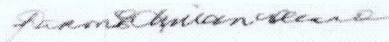
MCLE Exemption No. VII – EXD000076; 13 August 2019

MOTION FOR EXTENSION

Lapad, et al. v. Cusi, et al.
Civil Case No. C-707

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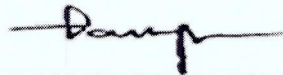
SHARON E. MILLAN-DECANO

Assistant Solicitor General

Roll of Attorneys No. 50521

IBP Lifetime No. 09132 / 04-28-2010

MCLE Exemption No. VII-OSG003357 / 02-18-2022



CHERYL ANGELINE M. ROQUE-JAVIER

Senior State Solicitor

Roll of Attorneys No. 49563

IBP Lifetime Membership No. 09131 / 04-28-2010

MCLE Compliance No. VII-0017901 / 05-13-2022

E-mail Address: camroque@osg.gov.ph

OFFICE OF THE SOLICITOR GENERAL

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COPY FURNISHED:

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DENR Region IV-B MIMAROPA

PENRO Compound, Brgy. Suqui

Calapan City, Oriental Mindoro

Satellite Office

6th Floor DENR by the Bay Bldg.

Roxas Blvd., Ermita, manila

**PROVINCIAL ENVIRONMENTAL AND
NATURAL RESOURCES OFFICE**

Suqui, Calapan City, Oriental Mindoro

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MOTION FOR EXTENSION

Lapad, et al. v. Cusi, et al.
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NATIONAL COMMISSION ON INDIGENOUS PEOPLES

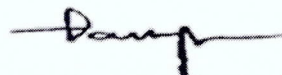
Oriental Mindoro Provincial Office

Bulalacao Service Center

#31 Cabrera St., Paclasan, Roxas, Oriental Mindoro

EXPLANATION

The foregoing ***Motion for Extension*** is being filed with this Honorable Court and served upon adverse counsel and/or other parties by registered mail and electronic means where applicable, personal filing and service not being practicable due to distance and lack of personnel to effect the same.



CHERYL ANGELINE M. ROQUE-JAVIER

Senior State Solicitor