

REPUBLIC OF THE PHILIPPINES
REGIONAL TRIAL COURT
FOURTH JUDICIAL REGION
ORIENTAL MINDORO
BRANCH XXXIX (39)
CALAPAN CITY

DENR MIMAROPA
RECORDS SECTION
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JUN 22 2023

☐ INCOMING ☐ OUTGOING
BY: _____ DATE NO. _____
TIME: _____

HEIRS OF SPOUSES NICOLAS D.
MANONGSONG AND BIENVENIDA
MANONGSONG namely:
CORAZON D. MANONGSONG,
MARIO D. MANONGSONG, BENITO
D. MANONGSONG, PEDRO D.
MANONGSONG, MANUELA D.
MANONGSONG, PENAFRANCIA D.
MANONGSONG, ARSENIA D.
MANONGSONG, ANTERO D.
MANONGSONG, PAUL M.
HOLMBERG, represented by
ANTERO D. MANONGSONG,
Petitioners,

-versus-

LRC-22-23480
*For: Correction of Erroneous Entries in
Original Certificate of Title No. P-1670*

THE REGISTRY OF DEEDS FOR
THE PROVINCE OF ORIENTAL
MINDORO,

Respondent.

X- -----X

FORMAL OFFER OF DOCUMENTARY EVIDENCE

Petitioners HEIRS OF SPOUSES NICOLAS D. MANONGSONG AND BIENVENIDA MANONGSONG namely: CORAZON D. MANONGSONG, MARIO D. MANONGSONG, BENITO D. MANONGSONG, PEDRO D. MANONGSONG, MANUELA D. MANONGSONG, PENAFRANCIA D. MANONGSONG, ARSENIA D. MANONGSONG, ANTERO D. MANONGSONG, PAUL M. HOLMBERG, represented by ANTERO D. MANONGSONG, by counsel, and unto this Honorable Court, most respectfully offer in evidence the following documentary exhibits in support of their petition for correction of entries, and for the following specific purposes:

EXHIBIT	DOCUMENT	PURPOSE
"A" to "A-2"	Special Power of Attorney dated 03 December 2021 consisting of three (3) pages	To prove that Petitioners authorized their attorney-in-fact to file the instant petition, to sign the verification and certification against forum shopping, to execute the <i>Judicial Affidavit</i> in support of the instant petition, and to appear at the jurisdictional hearing and reception of evidence relative to this petition

"B" to "B-2"	<i>Extrajudicial Settlement of Estate</i> dated 22 June 2021 consisting of three (3) pages	To prove that petitioners, including the attorney-in-fact, are the true, lawful and legitimate heirs of Nicolas and Bienvenida Manongsong who are the registered owners of the property covered by <i>OCT No. P-1670</i>
"C" to "C-4"	Page 1 of the true electronic copy of <i>OCT No. P-1670</i>	To prove the existence of a parcel of land covered by <i>OCT No. P-1670</i> which contains erroneous entries
"C-1"	Name of Nicolas Manongsong appearing on Page 1 of <i>OCT No. P-1670</i>	To prove that Spouses Nicolas Manongsong and Bienvenida Delgado Manongsong are the registered owners of a parcel of land covered by <i>OCT No. P-1670</i> situated in Barangay San Isidro, Puerto Galera, Oriental Mindoro, containing an area of One Thousand One Hundred Seventy Square Meters (1,170 Sq. M.);
"C-2-A"	Entry in the technical description, particularly: <u>"S. 68-29 W., 29.74 m. to point 1;</u> <u>Containing the area of NINE THOUSAND SEVEN HUNDRED AND SIX (9,706) Square Meters."</u>	That in the aforementioned <i>OCT No. P-1670</i> , the entries in the technical description, particularly the area and distance, were erroneously entered due to inadvertence of the staff of the Registry of Deeds
"D" to "D-2"	<i>Technical Description</i> for Lot No. 7293, CAD.533-D, Puerto Galera Cadastre	To prove that the said erroneous entries were different from those stated in the Subject Property's Technical Description issued by the Department of Environment and Natural Resources MIMAROPA Region – Surveys and Mapping Division
"E" to "E-3"	True electronic copy of <i>OCT No. P-1667</i> consisting of four (4) pages	To prove that the adjoining lots bounded on the northwest, southwest, and northeast are registered under the names of Nicolas and Bienvenida and as such, are also part of the inheritance of the petitioners

"F" to "F-3"	True electronic copy of <i>TCT</i> No. <i>T-127327</i> consisting of four (4) pages	To prove that the adjoining lots bounded on the northwest, southwest, and northeast are registered under the names of Nicolas and Bienvenida and as such, are also part of the inheritance of the petitioners
"G" to "G-1"	True electronic copy of <i>TCT</i> No. <i>064-2011003108</i> consisting of two (2) pages	To prove that the adjoining lot bounded on the southeast is registered under the names of Raphael Constantino, married to Flora Lee C. Evangelista; Monica Liza A. Evagelista, single; and Franco Leonardo A. Evangelista, married to Irene U. Evangelista
"H" to "H-1"	<i>Tax Declaration</i> No. <i>2015-110009-00707</i>	To prove that the parcel of land covered by <i>OCT</i> No. <i>P-1670</i> has been declared for taxation purposes in the name of the registered owners
"I" to "I-1"	<i>Certification</i> dated 05 November 2021	To prove that the parcel of land by <i>OCT</i> No. <i>P-1670</i> has no real estate tax delinquency since all taxes concerning said property have been duly paid
"J" to "J-11"	<i>Judicial Affidavit</i> of Antero D. Manongsong consisting of twelve (12) pages	To constitute of Antero D. Manongsong's direct testimony in the instant petition
"J-12"	Name and signature of Antero D. Manongsong appearing on Page 12 of his <i>Judicial Affidavit</i>	To prove the genuineness and due execution of the said <i>Judicial Affidavit</i>
"K" to "K-8"	<i>Petition</i> dated 27 December 2021 consisting of nine (9) pages	To prove that the Petitioners, through their attorney-in-fact, filed the <i>Petition</i> for the purpose of seeking the correction of erroneous entries in <i>OCT</i> No. <i>P-1670</i>
"K-9"	Name and signature of Antero D. Manongsong appearing on Page 9 of the <i>Petition</i>	To prove the genuineness and due execution of the <i>Petition</i>
"K-6-A"	Stamp "Received" by the Registry of Deeds appearing on Page 7 of the <i>Petition</i> showing service of <i>Petition</i> to the Registry of Deeds	To prove that the Registry of Deeds was furnished with a copy of the <i>Petition</i> in compliance with the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the

		requirements in order for the Court to acquire jurisdiction over the Petition
"K-6-B"	Stamp "Received" by the Office of the Provincial Prosecutor appearing on Page 7 of the <i>Petition</i> showing service of <i>Petition</i> to the Office of the Provincial Prosecutor	To prove that the Office of the Provincial Prosecutor was furnished with a copy of the Petition in compliance with the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"K-7-A"	<i>Registry Receipt No. RE 197 055 824 ZZ</i> attached on Page 8 of the <i>Petition</i> showing service of <i>Petition</i> to the Land Registration Authority	To prove that the Land Registration Authority was furnished with a copy of the Petition in compliance with the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"K-7-B"	<i>Registry Receipt No. RE 197 055 838 ZZ</i> attached on Page 8 of the <i>Petition</i> showing service of <i>Petition</i> to Spouses Raphael Constantino and Flora Lee C. Evangelista (Adjoining Owners)	To prove that the adjoining owner was furnished with a copy of the Petition in compliance with the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"K-7-C"	<i>Registry Receipt No. RE 197 055 841 ZZ</i> attached on Page 8 of the <i>Petition</i> showing service of <i>Petition</i> to Monica Liza A. Evangelista (Adjoining Owner)	To prove that the adjoining owner was furnished with a copy of the Petition in compliance with the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"K-7-D"	<i>Registry Receipt No. RE 197 055 855 ZZ</i> attached on Page 8 of the <i>Petition</i> showing service of <i>Petition</i> to Spouses Franco Leonardo A. Evangelista and Irene U. Evangelista (Adjoining Owners)	To prove that the adjoining owner was furnished with a copy of the Petition in compliance with the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"L" to "L-1"	<i>Order</i> dated 09 February 2022 consisting of two (2) pages	To prove that this Honorable Court directed the Petitioners to comply with the jurisdictional requirements

"M"	Registry Receipt No. RE 583 158 144 ZZ attached on the Affidavit of Service dated 02 May 2022 showing service of Order AND Petition and Annexes to Nereo V. Andolong III (who has adverse claim annotated at the back of the subject title)	To prove that Nereo V. Andolong III was furnished with a copy of the Petition and Annexes and Order dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"N"	Registry Receipt No. RE 538 160 412 ZZ attached on Affidavit of Service dated 02 May 2022 showing service of Petition and Annexes to the Office of the Solicitor General	To prove that the Office of the Solicitor General was furnished with a copy of the Petition and Annexes and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"O"	Office of the Solicitor General's Deputization Letter dated 23 March 2022 attached to the records of the case	To prove, among others, that the Office of the Solicitor General entered its appearance as counsel for the Republic of the Philippines in the above-entitled petition
"P" to "P-1"	Office of the Solicitor General's Notice of Appearance dated 23 March 2022 consisting of two (2) pages attached to the records of the case	To prove, among others, that the Office of the Solicitor General entered its appearance as counsel for the Republic of the Philippines in the above-entitled petition
"Q"	(Registry Receipt No. 45 (Registry Receipt No. RE 561 516 511 ZZ) attached to the records of the case showing service of Order to the Land Registration Authority	To prove that the Land Registration Authority was furnished with a copy of the Order dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"Q-1"	Registry Receipt No. 46 attached to the records of the case showing service of Order to the Office of the Registry of Deeds, Calapan City	To prove that the Office of the Registry of Deeds, Calapan City was furnished with a copy of the Order dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"Q-2"	Registry Receipt No. 47 attached to the records of the case showing service of Order to the Office of the Provincial Prosecutor	To prove that the Office of the Provincial Prosecutor was furnished with a copy of the Order dated 09 February 2022 and that Petitioners complied with all the requirements

		in order for the Court to acquire jurisdiction over the Petition
"Q-3"	Registry Receipt No. 48 (<i>Registry Receipt No. RE 561 516 508 ZZ</i>) attached to the records of the case showing service of <i>Order</i> to Spouses Franco Leonardo A. Evangelista and Irene U. Evangelista (Adjoining Owners)	To prove that the adjoining owner was furnished with a copy of the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"Q-4"	Registry Receipt No. 49 (<i>Registry Receipt No. RE 561 516 499 ZZ</i>) attached to the records of the case showing service of <i>Order</i> to counsel for the Petitioners	To prove that the counsel for the Petitioners was furnished with a copy of the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"Q-5"	Registry Receipt No. 50 attached to the records of the case showing service of <i>Order</i> to the Office of the Solicitor General	To prove that the Office of the Solicitor General was furnished with a copy of the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"Q-6"	Registry Receipt No. 51 (<i>Registry Receipt No. RE 561 516 485 ZZ</i>) attached to the records of the case showing service of <i>Order</i> to Monica Liza Evangelista (Adjoining Owner)	To prove that the adjoining owner was furnished with a copy of the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"Q-7"	Registry Receipt No. 52 attached to the records of the case showing service of <i>Order</i> to the counsel for the Petitioners	To prove that the counsel for the Petitioners was furnished with a copy of the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition
"Q-8"	Registry Receipt No. 53 (<i>Registry Receipt No. RE 561 516 471 ZZ</i>) attached to the records of the case showing service of <i>Order</i> to Spouses Raphael Constantino and Flora Lee C. Evangelista (Adjoining Owners)	To prove that the adjoining owner was furnished with a copy of the <i>Order</i> dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition

"R"	Certificate of Posting issued by Mr. Fernando D. Alcantara, Process Server, RTC Branch 39, Calapan City	To prove that the Petitioners complied with the posting requirements pursuant to the Order dated 09 February 2022 and that Petitioners complied with all the requirements in order for the Court to acquire jurisdiction over the Petition

All originally marked and sub-marked exhibits which were identified by the Petitioners' attorney-in-fact already form part of the records of this case. The foregoing documents are likewise being offered as part of the testimony of Petitioners' attorney-in-fact, Antero D. Manongsong.

With the admission of the foregoing exhibits, Petitioners respectfully rest their case.

PRAYER

WHEREFORE, it is respectfully prayed that Petitioners' documentary exhibits be marked accordingly.

Other just and equitable reliefs are likewise prayed for.

Calapan City, Oriental Mindoro, 30 May 2023.



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OFFICE OF THE PROVINCIAL PROSECUTOR
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Oriental Mindoro

(By Registered Mail)

OFFICE OF THE SOLICITOR GENERAL

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LAND REGISTRATION AUTHORITY

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WRITTEN EXPLANATION FOR SERVICE BY REGISTERED MAIL

Due to distance and lack of messengerial services to effect personal service, copies of this **Formal Offer of Documentary Evidence** were served upon the above-named parties by registered mail in lieu of personal service.


TYRON KIM D. BACULO

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31.05.2023

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