

REPUBLIC OF THE PHILIPPINES
SUPREME COURT
FOURTH JUDICIAL REGION
MUNICIPAL TRIAL COURT
STA. CRUZ, OCCIDENTAL MINDORO

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THE DIRECTOR OF LANDS,
Petitioner,

-versus-

Cadastral Case No. N-6
LRC Record No. N-240

LOT NO. 1306, PLS-22
SAN VICENTE, STA. CRUZ, OCC.
MINDORO

HEIRS OF FLORANTE A. TRIA,
Represented by: FE M. GALSIM,
HEIRS OF ADORACION Q. HERNANDEZ,
Represented by: ROSARIO RHODORA H. RAMOS,
HEIRS OF JOSE FERNANDEZ, SR.,
Represented by: JOSE FERNANDEZ, JR.,
SPOUSES ATTY. JOY C. LEGASPI and
FE ABELEDA LEGASPI,
MANUEL BAKUNAWA,
Represented by EMMA S. TAGALA,
HEIRS OF CLENIA TAJONERA,
Claimants.

X - - - - - X

THE DIRECTOR OF LANDS,
Petitioner,

-versus-

Cadastral Case No. N-6
LRC Record No. N-240

LOT NO. 1305, PLS-22
SAN VICENTE, STA. CRUZ, OCC.
MINDORO

HEIRS OF FRANCISCA CATAMA, et al.,
Represented by SUSAN CATAMA FERNANDEZ, and
HEIRS OF CLENIA TAJONERA,
Claimants.

X - - - - - X

MOTION FOR EXTENSION OF TIME TO FILE FORMAL
OFFER OF EVIDENCE
(For Claimants-Heirs of Clenia Tajonera)

Claimants-Heirs of Clenia V. Tajonera, by counsel and to this Honorable Court, respectfully state that:


1. Per Order dated March 24, 2023, Claimants-Heirs of Clenia V. Tajonera were given fifteen (15) days from notice to submit their written Formal Offer of Evidence. On March 27, 2023, the above-said order was received by Claimants-Heirs of Clenia V. Tajonera through counsel, hence, they have until April 11, 2023 to comply with the said Order.
2. However, due to the fact that the survey plan prepared by Engr. Jonathan L. Reyes for Claimants-Heirs of Clenia V. Tajonera for Lot 1306 (Part) Pls-22 is yet to be approved by the Department of Environment and Natural Resources, and due to the voluminous records of the case involving Lot 1305, Pls-22, the undersigned counsel is constrained to request for additional time to complete the claimants' written formal offer of evidence that will include the approved plans for the claimed properties in Lots 1306 and 1305, both in Pls-22, preferably sixty (60) days from April 11, 2023.
3. This motion is made in good faith and not intended to delay the proceedings of this Honorable Court for the above-mentioned case.

PRAYER

WHEREFORE, premises considered, it is most respectfully prayed before this Honorable Court that the instant motion be granted.

The award of other reliefs that this Honorable Court may deem just and equitable under the circumstances.

April 11, 2023, Mamburao for Sta. Cruz, Occidental Mindoro.


KATHRINE ANN A. ABELEDA
Counsel for the Claimants

Roll No. 59624

MCLE No. VII – 0021010 valid until 04/14/2025

MCLE No. VII – Pending Certification

IBP No. 274990 – 2023, Occidental Mindoro

PTR No. 3243364 – 2023, Occidental Mindoro

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ATTY. GANDHI G. GAGNI-FLORES

ATTY. JOSEPH D. DELOS SANTOS

Legal Division

Department of Environment and Natural Resources

MIMAROPA Region – Legal Division
1515 L&S Building, Roxas Boulevard
1000 Ermita, Manila

ATTY. LEVITICO B. SALCEDO

Counsel of Luz Gutierrez, Gemma Teresa Simbahan, and Victor Gutierrez
#2341 P. Burgos St., Brgy. Pag-Asa
San Jose, Occidental Mindoro

ME 629 780 1415 22 / 4-11-23

EXPLANATION

Service of this Motion upon the opposing party is by electronic mail instead of personal service because of distance and lack of messengerial aide to make personal service.



KATHRINE ANN A. ABELEDA