REPUBLIC OF THE PHILIPPINES
Court of Tax Appeals
Quezon City

FIRST DIVISION

COURT CALENDAR FOR OCTOBER 8, 2019, TUESDAY, AT 9:00 A.M.

PRESENT:

HON. ROMAN G. DEL ROSARIO	**Presiding Justice / Chairperson**
HON. ESPERANZA R. FABON-VICTORINO	**Associate Justice / Member**
HON. CATHERINE T. MANAHAN	**Associate Justice / Member**
ATTY. MARIA JOHOANNA F. CHAN-TE	**Executive Clerk of Court II**
MS. CARMINA B. BALIONG	**Executive Assistant II**
MS. RENELYN L. LARGA	**Court Stenographer IV**

MOTION/TRIAL:

1. ZENITH FOODS CORPORATION

versus **CTA Case No. 10001**

COMMISSIONER OF INTERNAL REVENUE

- **Motion to Commissioning an Independent Certified Public Accountant with attached Sworn Statement of Ms. Annalyn B. Artuz executed on September 13, 2019 filed by petitioner on September 16, 2019.**

(For the initial of presentation of petitioner's evidence)
- For the testimony of Ms. Clarissa Hornilla-Guerra with Sworn Statement executed on July 25, 2019 and filed by petitioner on July 26, 2019.

PC: Atty. Maria Rosario L. Bernardo *(notified)* **RC: Atty. Ayesha Hania Guiling-Matanog** *(notified)*
Atty. Jocel Isidro S. Dilag *(notified)*
Atty. Marjorie R. Rosario *(notified)*

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2. SITEL PHILIPPINES CORPORATION

versus **CTA Case No. 10076**

COMMISSIONER OF INTERNAL REVENUE

- **Motion to Avail of the Provisions of Section 5, Rule 12 of the Revised Rules of the Court of Tax Appeals filed by petitioner on October 3, 2019.**

(For the initial presentation of petitioner's evidence)
- For the testimony of Mr. Ronald Portula with Judicial Affidavit filed by petitioner on August 16, 2019.

- ***Submission with attached Judicial Affidavit of Ms. Madonna Mia S. Dayego filed by petitioner on October 3, 2019.***
- ***Manifestation with Compliance with attached annex photocopy of receipt filed by petitioner on October 3, 2019.***

PC: Atty. Mark Roland C. Domingo *(notified)* **RC: Atty. Marveen B. De La Paz** *(notified)*

TRIAL:

3. JED MARKETING CORPORATION

versus **CTA Case No. 9709**

COMMISSIONER OF INTERNAL REVENUE

(For the initial presentation of respondent's evidence)

- For the testimony of Revenue Officer Gene G. Etorma with Judicial Affidavit executed on March 14, 2018 and filed by respondent on March 16, 2018.

PC: Atty. Jose Carlito M. Montenegro *(notified)* **RC: Atty. Yvette C. Tenefrancia** *(notified)*

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4. DIZON COUNTRY FRESH INC.,

versus **CTA Case No. 9719**

COMMISSIONER OF INTERNAL REVENUE

(For the initial presentation of respondent's evidence)

- For the testimony of Revenue Officer Melvin Valenzuela.

PC: Atty. Jose Carlito M. Montenegro *(notified)* **RC: Atty. Abrillus Raffy C. Laguesma** *(notified)*
Atty. Avelino G. Alfelor, Jr. *(notified)*

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5. PETRON CORPORATION,

versus **CTA Case No. 9741**

COMMISSIONER OF INTERNAL REVENUE

(For the continuation of presentation of petitioner's evidence)

- For the testimonies of:
  1. Mr. Allan James T. Tenorio with Judicial Affidavit executed on January 25, 2019 and filed by petitioner on even date; and
  2. Ms. Marissa U. Viray with Judicial Affidavit executed on February 7, 2019 and filed by petitioner on even date.

PC: Atty. Rodel C. Unciano *(notified)* **RC: Atty. Rachelle L. Ngo** *(notified)*
Atty. Jomel N. Manaig *(notified)*

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6. PRIME INVESTMENT KOREA INC.,

versus **CTA Case No. 9814**

COMMISSIONER OF INTERNAL REVENUE

(For the continuation of presentation of petitioner's evidence)

- For the cross-examination of Mr. Miguel F. Tolentino with Judicial Affidavit executed on August 8, 2019 and filed by petitioner on August 9, 2019.

- For the testimony of Representative from PAGCOR.

- ***Submission of Judicial Affidavit of Salvador G. Valentino, Jr. filed by petitioner on October 4, 2019.***

PC: Atty. Suzette A. Celicious-Sy *(notified)* **RC: BIR-Litigation Division** *(notified)*
Atty. Kathleen Mae M. Villamin *(notified)*
Atty. Ana T. Dahilig *(notified)*

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7. RELIV PHILIPPINES INC.

versus **CTA Case No. 9894**

COMMISSIONER OF INTERNAL REVENUE

(For the initial presentation of petitioner's evidence)

- For the testimony of Ms. Genebel Reyes with Judicial Affidavit of executed on November 29, 2018 and filed by petitioner on December 3, 2018.

- ***Motion to Archive and Suspend Proceedings filed by petitioner on September 27, 2019.***

PC: Atty. Bernard O. Abad *(notified)* **RC: Atty. Yvette C. Tenefrancia** *(notified)*

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8. ERMILO TAN NG HUA

versus **CTA Case No. 9912**

COMMISSIONER OF INTERNAL REVENUE

(For the initial presentation of petitioner's evidence)

- For the testimony of Mr. Ermilo T. Ng Hua with Judicial Affidavit of executed on December 28, 2018 and filed by petitioner on March 4, 2019.

PC: Atty. Carlo L. Perez *(notified)* **RC: Atty. Luigi A. Bacani** *(notified)*
Atty. Edward V. Florin *(notified)*

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9. RCL FEEDERS PHILS., INC.

versus **CTA Case No. 9917**

COMMISSIONER OF INTERNAL REVENUE

(For the continuation of presentation of petitioner's evidence)

- For the testimonies of:
  1. Mr. Nolan F. Cabradilla with Judicial Affidavit executed on May 6, 2019 and filed by petitioner on even date; and
  2. Ms. Ma. Catherine C. Bachoco, Independent Certified Public Accountant (ICPA), with ICPA Report filed by petitioner on September 23, 2019.

PC: Atty. Kara Louisse B. Eramis *(notified)* **RC: Atty. Arlene R. Garcia-Andal** *(notified)*
Atty. Donato U. Vergara III *(notified* **Atty. Aprilyn T. Pobar** *(notified)*

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10. LAPANDAY DIVERSIFIED PRODUCTS CORP.

versus **CTA Case No. 9951**

COMMISSIONER OF INTERNAL REVENUE

(For the continuation of presentation of petitioner's evidence)

- For the testimonies of:
  1. Ms. Luzviminda T. Aguilar with Amended Judicial Affidavit filed by petitioner on September 27, 2019; and
  2. Ms. Evangeline E. Agcoaili, Independent Certified Public Accountant (ICPA), with Judicial Affidavit filed by petitioner on October 3, 2019; with ICPA Report and USB filed by petitioner on September 6, 2019.

- ***Manifestation of Compliance with attached Amended Judicial Affidavit of Ms. Luzviminda T. Aguilar filed by petitioner on September 27, 2019.***
- ***Manifestation of Compliance with attached Judicial Affidavit of Ms. Evangeline E. Agcaoili filed by petitioner on October 3, 2019.***

PC: Atty. Gabriel Habana *(notified)* **RC: Atty. Marionn Phillbee M. Tejada** *(notified)*

COMMISSIONER'S HEARING:

1. ORICA PHILIPPINES, INC.,

versus **CTA Case No. 9843**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of petitioner's exhibits)

PC: Atty. Jericho D. Valencia *(notified)*
Atty. Jocelyn T. Tsang *(notified)*
Atty. Harold S. Ocampo *(notified)*

RC: Atty. Marionn Phillbee M. Tejada *(notified)*

(Before Atty. Maria Johoanna F. Chan-Te, Executive Clerk of Court II, at 2:00 p.m.)

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2. PETRON CORPORATION,

versus **CTA Case Nos. 9751, 9813 & 9848**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of petitioner's exhibits)

PC: Atty. Ana Marie C. Lomboy *(notified)*
Atty. Laura Victoria A.S. Yuson-Layug *(notified)*
Atty. John Marti C. Duya *(notified)*

RC: Atty. Ayesha Hania Guiling-Matanog *(notified)*
Atty. Marveen B. Dela Paz *(notified)*

(Before Atty. Maria Johoanna F. Chan-Te, Executive Clerk of Court II, at 2:30 p.m.)

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3. ATENEO DE DAVAO UNIVERSITY

versus **CTA Case No. 9779**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of petitioner's exhibits)

PC: Atty. Kristine Joy G. Carlos *(notified)*
Atty. Alexis John S. Ramos *(notified)*

RC: Atty. Rozen Olivia G. Cayetano *(notified)*
Atty. Niki Beryl B. Dela Cruz *(notified)*

(Before Atty. Maria Johoanna F. Chan-Te, Executive Clerk of Court II, at 3:00 p.m.)

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4. LINDEN SUITES, INC., As represented by EUGENE U. BALCOS

versus **CTA Case No. 9360**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of respondent's exhibits)

PC: Atty. Christine E. Ocampo-De Guzman*(notified)* **RC: Atty. Philip A. Mayo** *(notified)*

(Before Atty. Maria Johoanna F. Chan-Te, Executive Clerk of Court II, at 3:30 p.m.)

ATTY. MARIA JOHOANNA F. CHAN-TE
Executive Clerk of Court II