REPUBLIC OF THE PHILIPPINES

COURT OF TAX APPEALS

QUEZON CITY

Second Division

COURT CALENDAR FOR WEDNESDAY, APRIL 26, 2023, 9:00 A.M.

VENUE: ***Second Division Courtroom, 2nd Floor, CTA Building II***

PRESENT:

HON. JEAN MARIE A. BACORRO-VILLENA	**Associate Justice / Acting Chairperson**
HON. LANEE S. CUI-DAVID	**Associate Justice / Junior Member**
ATTY. JESUS P. INOCANDO, JR.	**Executive Clerk of Court III**
MR. MARLON JOSEPH I. PINEDA	**Court Interpreter II**
MR. PAOLO ANGELITO E. PULMA	**Court Stenographer IV**
MS. ELVIRA D. REFORMINA	**Court Stenographer IV**

ON LEAVE:

HON. ERLINDA P. UY	**Associate Justice / Chairperson**

I. CRIMINAL CASE:

1. People of the Philippines

versus CTA CRIM. CASE No. O-1020

Ronald Punay Robin

(For the arraignment of the accused and for Pre-Trial Conference)

***with plaintiff's Pre-Trial Brief with Manifestation filed on March 8, 2023
****with accused's Pre-Trial Brief filed on April 25, 2023*

PP: Prosec. Gen. Benedicto A. Malcontento (notified)
Asst. Prosec. Jenny A. De Castro (notified)
Atty. Ramon B. Lorenzo (notified)
Atty. Rowell B. Vicente (notified)
Atty. Kristine Alma T. Cayabyab (notified)

DC: Atty. Socorro Maricel N. Nepomuceno (notified)

Accused: Ronald Punay Robin (notified)

II. CIVIL CASES:

1. Heirs of Spouses Eduardo M. Franco and Celia C. Franco namely, Maria Isabel C. Franco-Ignacio, Ferdinand C. Franco, Maria Cecilia C. Franco-Cruz, and the Heirs of Eduardo C. Franco, Jr. namely, Nancy A. Franco, Ivy Christine A. Franco, Franchesca Mae A. Franco-Lukban, Junile Emancel A. Franco, Marian Edylene A. Franco and Eduardo Angelo A. Franco

versus CTA CASE No. SCA-0002

Republic of the Philippines and the Commissioner of Internal Revenue and the Register of Deeds of Valenzuela City *(formerly CTA Case No. 11003)*

(For the continuation of the presentation of the evidence for the petitioners, re: Urgent Motion for the Issuance of a Temporary Restraining Order and/or Writ of Preliminary Injunction and/or Status Quo Ante Order, re: petitioner's Petition for Certiorari)

****Subpoena Duces Tecum and Ad Testificandum* was issued to Mr. Glenn B. Alde, of the BIR Main Office, on April 20, 2023
****with respondent's Urgent Omnibus Motion (Ad Cautelam) [1. To Quash the Subpoena Duces Tecum/Ad Testificandum; 2. For Early Resolution of the Issue of Jurisdiction], filed on April 24, 2023*

PC: Atty. Jayson L. Fernandez (notified)
Atty. Jomini C. Nazareno (notified)
Atty. Jerald C. Ambe (notified)

RC: Atty. Niki Beryl B. Dela Cruz (notified)

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2. Tridharma Marketing Corp.

versus CTA CASE No. 10907

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Refund Case**)

***with petitioner's Pre-Trial Brief filed on April 18, 2023
***with Judicial Affidavit of petitioner's witness, Frances Grace Allyana E. Orbeta, filed on July 1, 2022
***with petitioner's Secretary's Certificate, attached to the Petition for Review, filed on July 1, 2022

****with respondent's Pre-Trial Brief filed on April 20, 2023*
***without the affidavits of respondent's witnesses, as required by the Judicial Affidavit Rule
***without respondent's Special Power of Attorney

PC: Atty. Ferdinand M. Hidalgo (notified)
Atty. Frances Grace Allyana E. Orbeta (notified)

RC: Atty. Ayesha Hania G. Matanog (notified)

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3. Helix Mining and Development Corporation (formerly "Holcim Mining and Development Corporation")

versus CTA CASE No. 10974

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Assessment Case**)

***without petitioner's Pre-Trial Brief
***with Judicial Affidavit of petitioner's witness, Deeryn C. Ultra, filed on September 9, 2022
***with Judicial Affidavit of petitioner's witness, Renato A. Baja, filed on October 19, 2022
***with petitioner's Secretary's Certificate, attached to the Petition for Review, filed on September 9, 2022, signed by Asst. Corporate Secretary Aziza Hannah A. Bacay
****with petitioner's Manifestation filed on April 24, 2023 (with 1 USB)*

***with respondent's Pre-Trial Brief filed on April 19, 2023
***without the affidavits of respondent's witnesses, as required by the Judicial Affidavit Rule
***without respondent's Special Power of Attorney

PC: Atty. Euney Marie J. Mata-Perez (notified)
Atty. Aziza Hannah A. Bacay (notified)
Atty. Ramon Vaughn F. Dy III (notified)
Atty. Gladys Jane M. Dela Cruz (notified)

RC: Atty. Wilmer B. Dekit (notified)
Atty. Jared Mitchell V. Acuña (notified)

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4. Helix Resources and Development Corporation (formerly Holcim Resources and Development Corporation)

versus CTA CASE No. 10978

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Assessment Case**)

****with petitioner's Pre-Trial Brief filed on April 20, 2023*
***with Judicial Affidavit of petitioner's witness, Deeryn C. Ultra, filed on September 15, 2022
***with Judicial Affidavit of petitioner's witness, Lambert L. Aguisanda, filed on September 15, 2022
***with petitioner's Secretary's Certificate, attached to the Petition for Review, filed on September 15, 2022, signed by Asst. Corporate Secretary Aziza Hannah A. Bacay

***with respondent's Pre-Trial Brief filed through LBC and received by the Court on April 19, 2023
***with Judicial Affidavit of respondent's witness, Rodjyl Joseph Arboleda, filed through registered mail and received by the Court on December 13, 2022
***with Judicial Affidavit of respondent's witness, Mahammad Ali Rodi, filed through registered mail and received by the Court on December 13, 2022
***with respondent's Special Power of Attorney, attached to the Pre-Trial Brief, filed through LBC and received by the Court on April 19, 2023, signed by RD Edgar B. Tolentino

PC: Atty. Euney Marie J. Mata-Perez (notified)
Atty. Aziza Hannah A. Bacay (notified)
Atty. Ramon Vaughn F. Dy III (notified)
Atty. Gladys Jane M. Dela Cruz (notified)

RC: Atty. Wilmer B. Dekit (notified)
Atty. Anna Karenina S. Pabrua (notified)

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5. Sankyu-Ats Consortium-B

versus CTA CASE No. 10676

Commissioner of Internal Revenue

(For the presentation of the ICPA, Josefina F. Garcia, of her Report)

PC: Atty. Ma. Louella M. Aranas (notified)

RC: Atty. Marveen B. Dela Paz (notified)

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6. Zambales Diversified Metals Corporation

versus CTA CASE No. 10783

Commissioner of Internal Revenue

(For the presentation of the ICPA, Katherine O. Constantino, of her Report)

***with Judicial Affidavit of the ICPA, Katherine O. Constantino, filed on April 11, 2023
****with ICPA Report filed on April 20, 2023 (with 1 USB)*

PC: Atty. Irwin C. Nidea, Jr. (notified)
Atty. Rodel C. Unciano (notified)
Atty. Jomel N. Manaig (notified)

RC: Atty. Marveen B. De La Paz (notified)
Atty. Rozen Olivia G. Cayetano (notified)

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7. Konica Minolta Marketing Services (Philippines), Inc.

versus CTA CASE No. 10908

Commissioner of Internal Revenue

(For the hearing of petitioner's Motion to Commission ICPA filed on February 28, 2023)

***with Judicial Affidavit of petitioner's proposed ICPA, Michael L. Aguirre, filed on February 28, 2023

PC: Atty. Priscilla B. Valer (notified)
Atty. Daniel Angelo V. Mendoza (notified)

RC: Atty. Raul S.J. De Guzman (notified)
Atty. Carl Fitri A. Hussin (notified)

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8. My Solid Technologies and Devices Corporation

versus CTA CASE No. 10925

Commissioner of Internal Revenue

(For the hearing of petitioner's Motion to Commission ICPA)

****with petitioner's Motion to Commission ICPA filed on April 20, 2023*
****with Judicial Affidavit of petitioner's proposed ICPA, Neil U. Sison, filed on April 20, 2023*

PC: Atty. Mardomeo N. Raymundo, Jr. (notified)
Atty. Philipp King S. Cartagena (notified)
Atty. Don Bernard T. Damasco Ty (notified)

RC: Atty. Abrillus Raffy C. Laguesma (notified)
Atty. Avelino G. Alfelor, Jr. (notified)

HEARING BEFORE THE COMMISSIONER:

1. BJ Well Services Company (Philippines), Inc.

versus CTA CASE No. 10244

Commissioner of Internal Revenue

(Atty. Jesus P. Inocando, Jr. – Executive Clerk of Court III – 1:30 p.m.)

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2. Ford Group Philippines, Inc.

versus CTA CASE No. 10728

Commissioner of Internal Revenue

(Atty. Jesus P. Inocando, Jr. – Executive Clerk of Court III – 1:30 p.m.)

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3. CCT Multi-Purpose Cooperative (Formerly CCT Credit Cooperative)

versus CTA CASE No. 10351

Commissioner of Internal Revenue

(Atty. Jesus P. Inocando, Jr. – Executive Clerk of Court III – 2:00 p.m.)

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4. Manulife Data Services, Inc.

versus CTA CASE No. 10926

Commissioner of Internal Revenue

(Atty. Jesus P. Inocando, Jr. – Executive Clerk of Court III – 2:00 p.m.)

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5. Fortune Medicare, Inc.

versus CTA CASE No. 10613

Commissioner of Internal Revenue

(Atty. Jesus P. Inocando, Jr. – Executive Clerk of Court III – 2:30 p.m.)

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