REPUBLIC OF THE PHILIPPINES
Court of Tax Appeals
Quezon City

FIRST DIVISION

COURT CALENDAR FOR TUESDAY, AUGUST 8, 2023, AT 9:00 A.M.
HEARING IN OPEN COURT

PRESENT:

HON. JEAN MARIE A. BACORRO-VILLENA	**Associate Justice/Acting Chairperson**
HON. LANEE S. CUI-DAVID	**Associate Justice/Member**
ATTY. MARGARETTE Y. GUZMAN	**Executive Clerk of Court III**
MS. IRENE S. FIRMALAN	**Court Stenographer III**
MS. ALYSSA KRISTINE D. LUNA-CUEVO	**Interpreter II**

HON. ROMAN G. DEL ROSARIO (Substitute Member for 3rd Division Hearing)

MOTION/TRIAL:

1. CONVEYING AND PACKAGING CO. INC.,

versus **CTA Case No. 10844**

COMMISSIONER OF INTERNAL REVENUE

- **Compliance with Motion filed by petitioner via email on August 1, 2023.**
- **Submission filed by respondent on August 7, 2023.**
- **Explanation and Compliance filed by respondent on August 7, 2023.**

(For the initial presentation of petitioner's evidence)
- ***For the testimony of Ms. Annabelle Zalamea with Amended Judicial Affidavit (Witness Annabelle Zalamea) executed on March 6, 2023, attached to petitioner's Pre-Trial Brief posted on March 6, 2023.***

PC: Atty. Franchesca Angeline S. Dayrit *(notified)* **RC: Atty. Joshua Y. Bagotsay** *(notified)*

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2. FORD GROUP PHILIPPINES, INC.,

versus **CTA Case No. 10877**

COMMISSIONER OF INTERNAL REVENUE

- **Motion to Commission (an Independent Certified Public Accountant) filed by petitioner on April 24, 2023; w*ith Judicial Affidavit of Atty. Conrado M. Briones executed on May 2, 2023 attached to petitioner's Submission filed on May 3, 2023*.**

(For the initial presentation of petitioner's evidence)
- ***For the testimony of Ms. Jo-Anne T. Matas with Judicial Affidavit subscribed on June 7, 2022 attached to petitioner's Submission (Judicial Affidavit of Jo-Anne T. Matas) filed on June 8, 2022.***

PC: Atty. Gian Carlo S. Cardiño *(notified)* **RC: Atty. Rozen Olivia G. Cayetano** *(notified)*

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3. AVALOQ PHILIPPINES OPERATING HEADQUARTERS

versus **CTA Case No. 10922**

COMMISSIONER OF INTERNAL REVENUE

- **Motion for Commissioning of Independent Certified Public Accountant filed by petitioner on June 27, 2023; *with attached Judicial Affidavit of Lucky Francis P. Felipe executed on June 27, 2023.***

(For the initial presentation of petitioner's evidence)

- ***For the testimony of Ms. Viena Joy S. Mangaring with Judicial Affidavit of Viena Joy S. Mangaring executed on July 15, 2022, attached to the Petition for Review filed by petitioner on even date; with Supplemental Judicial Affidavit of Viena Joy S. Mangaring executed on February 13, 2023, attached to Submission (of the Pre-Trial Brief of Petitioner Avaloq Philippines Operating Headquarters) filed on even date.***

PC: Atty. A.J. John M. Carbonell *(notified)* **RC: Atty. Clarissa J. Virtudes-Babaran** *(notified)*
Atty. Gene Paolo S. Guevarra *(notified)*
Atty. Jericho D. Valencia *(notified)*

TRIAL:

4. HALLIBURTON WORLDWIDE LIMITED - PHILIPPINE BRANCH

versus **CTA Case No. 10708**

COMMISSIONER OF INTERNAL REVENUE

- **Compliance filed by respondent on August 4, 2023.**

(For the initial presentation of petitioner's evidence)

- ***For the testimonies of:***

1. ***Mr. Richard S. Querido, Independent Certified Public Accountant, with Sworn Statement of Mr. Richard S. Querido to Questions Propounded by Atty. Jellyn C. Clemente executed on July 21, 2023, attached to petitioner's Submission of Sworn Statement of Mr. Richard S. Querido filed on even date; with ICPA Report and USB filed on May 2, 2023; and***
2. ***Ms. Aubrey Madridano with Sworn Statement of Ms. Aubrey Madridano to Questions Propounded by Atty. Jellyn C. Clemente subscribed on October 26, 2022 attached to petitioner's Submission filed on October 28, 2022.***

PC: Atty. Jellyn C. Clemente *(notified)* **RC: Atty. Joana Q. Bilongilot** *(notified)*

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5. BOEHRINGER INGELHEIM (PHILIPINES), INC.,

versus **CTA Case No. 10758**

COMMISSIONER OF INTERNAL REVENUE

(For the initial pentation of respondent's evidence)

- ***For the testimony of Revenue Officer Ellen TS Espiritu with Offer of Testimony of Revenue Officer Elle TS. Espiritu (with Attached Judicial Affidavit of Revenue Officer Ellen TS. Espiritu), executed on June 10, 2022, filed by respondent on June 16, 2022.***

PC: Atty. Rudolf Conrad G. De Luna *(notified)* **RC: Atty. Bryan Anthony C. Diego** *(notified)*
Atty. Rita Marie L. Mesina-Alvaera *(notified)*

COMMISSIONER'S HEARING:

1. CHAT NOIR CO., INC.,

versus **CTA Case No. 10958**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of petitioner's exhibits)

PC: Atty. Mary Grecelle G. Adarme-Rovero *(notified)* **RC: Atty. Mclair D. Garcia** *(notified)*

(Before Atty. Margarette Y. Guzman, Executive Clerk of Court III, at 1:30 p.m.)

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2. NIPPON EXPRESS PHILIPPINES CORPORATION

versus **CTA Case No. 10993**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of petitioner's exhibits)

PC: Atty. Gian Carlo S. Cardiño *(notified)* **RC: Atty. Clarissa J. Virtudes-Babaran** *(notified)*

(Before Atty. Margarette Y. Guzman, Executive Clerk of Court III, at 1:30 p.m.)

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3. NIPPON EXPRESS PHILIPPINES CORPORATION

versus **CTA Case No. 10993**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of respondent's exhibits)

PC: Atty. Gian Carlo S. Cardiño *(notified)* **RC: Atty. Clarissa J. Virtudes-Babaran** *(notified)*

(Before Atty. Margarette Y. Guzman, Executive Clerk of Court III, at 2:00 p.m.)

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4. NOATUM LOGISTICS PHILIPPINES, INC.
(formerly MIQ LOGISTICS PHILIPPINES, INC.)

versus **CTA Case No. 10867**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of petitioner's exhibits)

PC: Atty. Garth F. Castañeda *(notified)* **RC: Atty. Fely Rose R. Daganta** *(notified)*

(Before Atty. Margarette Y. Guzman, Executive Clerk of Court III, at 2:00 p.m.)

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5. NOATUM LOGISTICS PHILIPPINES, INC.
(formerly MIQ LOGISTICS PHILIPPINES, INC.)

versus **CTA Case No. 10867**

COMMISSIONER OF INTERNAL REVENUE

(For the marking of respondent's exhibits)

PC: Atty. Garth F. Castañeda *(notified)* **RC: Atty. Fely Rose R. Daganta** *(notified)*

(Before Atty. Margarette Y. Guzman, Executive Clerk of Court III, at 2:30 p.m.)

ATTY. MARGARETTE Y. GUZMAN
Executive Clerk of Court III