REPUBLIC OF THE PHILIPPINES

COURT OF TAX APPEALS

QUEZON CITY

Second Division

COURT CALENDAR FOR TUESDAY, AUGUST 29, 2023, 9:00 A.M.

VENUE: ***Second Division Courtroom, 3rd Floor, CTA Building II***

PRESENT:

HON. MARIA ROWENA MODESTO-SAN PEDRO	**Associate Justice / Acting Chairperson**
HON. CORAZON G. FERRER-FLORES	**Associate Justice / Junior Member**
ATTY. JESUS P. INOCANDO, JR.	**Executive Clerk of Court III**
MS. RUBIE G. BODOTA	**Court Stenographer IV**
MR. MARLON JOSEPH I. PINEDA	**Court Interpreter II**

ON LEAVE:

HON. MA. BELEN M. RINGPIS-LIBAN	**Associate Justice / Chairperson**

I. CRIMINAL CASE:

1. People of the Philippines

versus CTA CRIM. CASE No. O-1002

Reynaldo Y. Dia and Fritz and Maczoil Asia, Inc.

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

***with prosecution's Pre-Trial Brief filed on July 27, 2023
***As per Resolution of the Court dated August 4, 2023, accused was given until August 24, 2023 to file his Pre-Trial Brief

PP: Prosec. Gen. Benedicto A. Malcontento (notified)
Asst. State Prosec. Hjalmar M. Quintana, Jr. (notified)
Atty. Dyrene Mara S. Rosario (notified)
Atty. Albert C. Arpon (notified)

DC: Atty. Ma. Sofia J. Gatchalian (notified)

Accused: Reynaldo Y. Dia (notified)

II. CIVIL CASES:

1. Fort Bonifacio Development Corporation

versus CTA CASE No. 11168

Commissioner of Internal Revenue

(For the hearing of petitioner's Urgent Motion to Suspend the Collection of Tax, Issue Temporary Restraining Order, and Dispense with the Payment of Bond, incorporated in the Petition for Review, filed on May 25, 2023)

PC: Atty. Jomel Manaig (notified)

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

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2. The Philippine Stock Exchange, Inc.

versus CTA CASE No. 11195

Commissioner of Internal Revenue

(For the continuation of the presentation of the evidence for the petitioner, re: Motion for Suspension of Collection of Taxes and Dispensation of the Requirement to Post a Bond)

***with Supplemental Judicial Affidavit of petitioner's recalled witness, Eliza S. Rodriguez, executed and filed on August 3, 2023
***with respondent's Motion for Extension of Time to File Answer filed on August 22, 2023

PC: Atty. Gian Carlo S. Cardiño (notified)

RC: Atty. Marveen B. De La Paz (notified)
Atty. Michael Kevin P. Bayona (notified)

3. Paynamics Technologies, Inc.

versus CTA CASE No. 11206

Commissioner of Internal Revenue

(For the hearing of petitioner's Urgent Motion to Suspend the Collection of Tax, Issue Temporary Restraining Order, and Dispense with the Payment of Bond, incorporated in the Petition for Review, filed on July 5, 2023)

***with Judicial Affidavit of petitioner's witness, Bridget L. Tubale, executed on July 5, 2023 and attached to Petition for Review filed on July 5, 2023
***with respondent's Comment/Opposition to petitioner's Urgent Motion to Suspend Collection of Tax, Issue Temporary Restraining Order, and Dispense with the Payment of Bond, filed on August 1, 2023

PC: Atty. Rodel C. Unciano (notified)
Atty. Donato U. Vergara III (notified)
Atty. Karlovy L. Dalin (notified)

RC: Atty. Dyrene Mara S. Rosario (notified)
Atty. Albert C. Arpon (notified)

4. Quantuvis Resources Corporation

versus CTA CASE No. 11148

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Assessment Case**)
(For the hearing of petitioner's Prayer to Lift Warrant of Distraint and/or Levy and Urgent Motion to Suspend Collection Taxes, incorporated in the Petition for Review, filed on April 28, 2023)

***without petitioner's Pre-Trial Brief
***with Judicial Affidavit of petitioner's witness, Myra G. Lucos, executed on April 28, 2023 and attached to Petition for Review filed on April 28, 2023
***with Judicial Affidavit of petitioner's witness, Mary Ann C. Ongyiu, executed on April 28, 2023 and attached to Petition for Review filed on April 28, 2023
***with Supplemental Judicial Affidavit of petitioner's witness, Mary Ann C. Ongyiu, executed on August 14, 2023 and filed on August 14, 2023
***with petitioner's Secretary's Certificate, attached to Petition for Review, filed on April 28, 2023
***with petitioner's Motion for Judgment on the Pleadings filed on August 14, 2023.

***without respondent's Pre-Trial Brief
***without the affidavits of respondent's witnesses, as required by the Judicial Affidavit Rule
***without respondent's Special Power of Attorney
***with respondent's "Opposition" to petitioner's Motion to Lift Warrant of Distraint and/or Levy and Urgent Motion to Suspend Collection Taxes, filed thru registered mail on June 7, 2023 and received by the Court on June 20, 2023

PC: Atty. Enrico G. Valdez (notified)
Atty. Reno R. Gonzales, Jr. (notified)
Atty. Ysabel Kathryn M. Santos (notified)

RC: Atty. Rose Anne O. Tolentino (notified)

5. Avaloq Philippines Operating Headquarters

versus CTA CASE No. 11077

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Refund Case**)

***without petitioner's Pre-Trial Brief
***with Judicial Affidavit of petitioner's witness, Viena Joy S. Mangaring, executed on January 26, 2023 and attached to Petition for Review filed on January 26, 2023
***with petitioner's Director's Certificate, attached to Petition for Review, filed on January 26, 2023, appointing Mr. Minco Domingo, Jr. as the Attorney-in-Fact of petitioner.
***with Special Power of Attorney from Mr. Minco Domingo, Jr. authorizing the Law Office of Cabrera & Company to appear at the CTA for the scheduled Pre-Trial.

***without respondent's Pre-Trial Brief
***without the affidavits of respondent's witnesses, as required by the Judicial Affidavit Rule
***without respondent's Special Power of Attorney

PC: Atty. Jose Patrick S. Rosales (notified)
Atty. Jericho D. Valencia (notified)
Atty. A.J. John M. Carbonell (notified)

RC: Atty. Ayesha Hania G. Matanog (notified)
Atty. Dorothy Joy A. Cay-An (notified)

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6. Everwing Profem Corporation

versus CTA CASE No. 11082

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Assessment Case**)

***without petitioner's Pre-Trial Brief
***with Judicial Affidavit of petitioner's witness, Shara Fae Tangan, executed on February 1, 2023 and attached to Petition for Review filed on February 3, 2023
***with petitioner's Secretary's Certificate, attached to Petition for Review, filed on February 3, 2023, authorizing Galias and Rivera Law Offices to appear before the CTA for the scheduled Pre-Trial.

***without petitioner's Pre-Trial Brief
***without the affidavits of respondent's witnesses, as required by the Judicial Affidavit Rule
***without respondent's Special Power of Attorney

PC: Atty. Linus T. Galias (notified)
Atty. Jean Francois D. Rivera III (notified)
Atty. Franchesca Angeline S. Dayrit (notified)

RC: Atty. Sheeherazadee A. Labor-Maron (notified)
Atty. Paulyn Ann A. Umipig-Labucay (notified)
Atty. Neri Danessa B. Labayog (notified)

7. Deutsche Knowledge Services Pte.

versus CTA CASE No. 11083

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Refund Case**)

***without petitioner's Pre-Trial Brief
***with Judicial Affidavit of petitioner's witness, Felix Bueno Angue, Jr., executed on February 9, 2023 and attached to Petition for Review filed on February 9, 2023
***with Certified Extract of the Minutes of the Meeting of the Board Director's held on September 28, 2021, authorizing the Law Office of Salvador Llanillo and Bernardo, as the petitioner's Attorneys-at-Law.

***without respondent's Pre-Trial Brief
***with Judicial Affidavit of respondent's witness, RO Florence Diana B. Villapando-Mendoza, executed on July 26, 2023 and filed on July 27, 2023
***without respondent's Special Power of Attorney

PC: Atty. Maria Rosario L. Bernardo (notified)
Atty. Rabiev Tobias M. Racho (notified)
Atty. Leah Francesca M. Castillo (notified)
Atty. Marc Christian M. Lopez (notified)

RC: Atty. Ayesha Hania G. Matanog (notified)
Atty. Lara Nicole T. Gonzales (notified)

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8. Encore Receivable Management, Inc.

versus CTA CASE No. 10449

Commissioner of Internal Revenue

(For the presentation of the ICPA, Krista V. Bambao, of her Report)

***with Judicial Affidavit of the ICPA, Krista V. Bambao, executed and filed on June 26, 2023

PC: Atty. Kathleen C. Galano (notified)
Atty. Homelo V. Estoque (notified)
Atty. Jolynnah M. Diño (notified)

RC: Atty. Erica U. Tuico (notified)
Atty. Vismarck S. Uy (notified)

9. Mansion Maintenance Co., Inc.

versus CTA CASE No. 10535

Commissioner of Internal Revenue

(For the presentation of the evidence for the petitioner)

***with Judicial Affidavit of petitioner's witness, Gloria U. Basaysay, executed on May 22, 2021 and attached to Petition for Review filed on May 24, 2021

PC: Atty. Lance Cristopher D. Padilla (notified)

RC: Atty. Wilmer B. Dekit (notified)
Atty. Joanna Q. Bilongilot (notified)

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10. Nora San Pablo Bordeos

versus CTA CASE No. 10667

Commissioner of Internal Revenue,
and Regional Director of Revenue
Region No. 7A, Quezon City

(For the presentation of the lone witness for the petitioner)

***with Judicial Affidavit of petitioner's lone witness, Nora San Pablo Bordeos, executed on November 5, 2021 and filed on November 8, 2021

PC: Atty. Bryan Lloyd L. Dela Rosa (notified)
Atty. Alexa Bianca Chaliz S. Recasata (notified)
Atty. Dan Aldwin C. Pepito (notified)

RC: Atty. Marlon M. Mendoza (notified)
Atty. Dayne B. Medina (notified)
Atty. Joshua Y. Bagotsay (notified)

HEARING BEFORE THE COMMISSIONER:

1. CF Sharp Crew Management, Inc.

versus CTA CASE No. 10969

Commissioner of Internal Revenue

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

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2. Ceva Animal Health (Philippines), Inc.

versus CTA CASE No. 11007

Commissioner of Internal Revenue

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

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