REPUBLIC OF THE PHILIPPINES
Court of Tax Appeals
Quezon City

# FIRST DIVISION

## COURT CALENDAR FOR WEDNESDAY, APRIL 24, 2024 AT 9:00 A.M.
## HEARING IN OPEN COURT

**PRESENT:**

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| **HON. ROMAN G. DEL ROSARIO** | **Presiding Justice/Chairperson** |
| **HON. JEAN MARIE A. BACORRO-VILLENA** | **Associate Justice/Member** |
| **ATTY. MARIA JOHOANNA F. CHAN-TE** | **Executive Clerk of Court II** |
| **MS. BLESSY E. TEODORO** | **Court Stenographer IV** |
| **MS. ALYSSA KRISTINE D. LUNA-CUEVO** | **Interpreter II** |

**ON LEAVE: HON. LANEE S. CUI-DAVID**

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## MOTION:

**1. PPI HOLDINGS, INC.**

***versus*** **CTA Case No. 11404**

**COMMISSIONER OF INTERNAL REVENUE**

- **Hearing on the petitioner's Urgent Verified Motion: (A) To Lift Warrant of Distraint and/or Levy; and (B) To Suspend the Collection of Taxes filed on February 19, 2024; *with attached Judicial Affidavit of Analiza C. Santiago executed on February 12, 2024.***
- **Records Verification dated April 22, 2024 parties failed to submit the Judicial Affidavit of witnesses in support of the motion as per Resolution dated April 15, 2024.**

PC: **Atty. Eric R. Recalde** *(notified)*
**Atty. Fatima Faye E. Cordova** *(notified)*
**Atty. Benedict R. Tugonon** *(notified)*

RC: **Atty. Mark Joey S. Lucero** *(notified)*

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## TRIAL:

**2. SCG MARKETING PHILIPPINES, INC.,**

***versus*** **CTA Case No. 10779**

**COMMISSIONER OF INTERNAL REVENUE**

**(For the initial presentation of petitioner's evidence)**

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

1. ***Ms. Mary Rose Nierva Estebar with Judicial Affidavit subscribed on February 26, 2024 (Exhibit P-21), attached to the petitioner's Compliance filed on even date; and***
2. ***Ms. Zenaida Cajayon with Judicial Affidavit subscribed on December 1, 2023, attached to petitioner's Motion for Leave to Admit Attached Amended Judicial Affidavit & Allowance of Additional Testimony from Another Witness & for Admission of her Attached Judicial Affidavit filed on December 5, 2023.***

PC: **Atty. Neith T. Vigo** *(notified)*

RC: **Atty. Anna Karenina S. Pabrua** *(notified)*
**Atty. Aprilyn T. Pobar** *(notified)*
**Atty. Sheryll P. Cacayuran** *(notified)*

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**3. RACAL CERAMICS BARGAIN CENTER, INC.,**

***versus*** **CTA Case No. 10812**

**COMMISSIONER OF CUSTOMS**

**(For the initial presentation of respondent's evidence)**

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

1. ***Revenue Officer Charisse S. Lumawag with Judicial Affidavit executed on June 13, 2022, posted by respondent on June 13, 2022; and***
2. ***Atty. Maria Minerva B. Aldave with Judicial Affidavit executed on June 13, 2022, posted by respondent on June 13, 2022.***

**PC: Atty. Jasmin Angeli Grace Zulueta-Plameras** *(notified)* **RC: Asst. Sol. Lanz Aidan L. Olives** *(notified)*

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**4. PRODUCTIVITY TECHNOLOGIES SERVICES INC.,**

***versus*** **CTA Case No. 10873**

**COMMISSIONER OF INTERNAL REVENUE**

**(For the initial presentation of respondent's evidence)**

- ***For the testimony of Revenue Officer Jchellyn H. Salazar with Judicial Affidavit executed on March 18, 2024 filed by respondent on March 19, 2024.***

**PC: Atty. Rachel Anne C. Baroja** *(notified)* **RC: Atty. Joel Vincent D. Salazar** *(notified)*

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## COMMISSIONER'S HEARING:

**1. ECOZONE POWER MANAGEMENT, INC.,**

versus **CTA Case No. 11445**

**COMMISSIONER OF INTERNAL REVENUE**

**(For the marking of petitioner's exhibits)**

**PC: Atty. Nicollo Emmanuel J. Padilla** *(notified)* **RC: Atty. Faustino B. Lumabao, Jr,** *(notified)*

*(Before Atty. Maria Johoanna F. Chan-Te, Executive Clerk of Court II, at 1:30 p.m.)*

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**2. HELIX MINING AND DEVELOPMENT CORPORATION (formerly "HOLCIM MINING AND DEVELOPMENT CORPORATION")**

versus **CTA Case No. 10974**

**COMMISSIONER OF INTERNAL REVENUE**

**(For the marking of petitioner's exhibits)**

**PC: Atty. Lew Earvin H. Manarin** *(notified)* **RC: Atty. Jared Mitchell V. Acuña** *(notified)*

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

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**3. HELIX RESOURCES AND DEVELOPMENT CORPORATION (formerly HOLCIM RESOURCES AND DEVELOPMENT CORPORATION)**

versus **CTA Case No. 10978**

**COMMISSIONER OF INTERNAL REVENUE**

**(For the marking of petitioner's exhibits)**

**PC: Atty. Aziza Hannah A. Bacay** *(notified)* **RC: Atty. Anna Karenina S. Pabrua** *(notified)*

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

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**4. PPI HOLDINGS, INC.,**

versus **CTA Case No. 11404**

**COMMISSIONER OF INTERNAL REVENUE**

**(For the marking of petitioner's exhibits)**

**PC: Atty. Princess Rexille V. Liboon** *(notified)*
**Atty. Morgan Christan Acol** *(notified)*
**RC: Atty. Mark Joey S. Lucero** *(notified)*

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

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**5. PPI HOLDINGS, INC.,**

versus **CTA Case No. 11404**

**COMMISSIONER OF INTERNAL REVENUE**

**(For the marking of petitioner's exhibits)**

**PC: Atty. Princess Rexille V. Liboon** *(notified)*
**Atty. Morgan Christan Acol** *(notified)*
**RC: Atty. Mark Joey S. Lucero** *(notified)*

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

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