REPUBLIC OF THE PHILIPPINES

COURT OF TAX APPEALS

QUEZON CITY

Second Division

COURT CALENDAR FOR THURSDAY, APRIL 18, 2024, 9:00 A.M.

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

PRESENT:

HON. MA. BELEN M. RINGPIS-LIBAN	**Associate Justice / Chairperson**
HON. MARIA ROWENA MODESTO-SAN PEDRO	**Associate Justice / Senior Member**
HON. CORAZON G. FERRER-FLORES	**Associate Justice / Junior Member**
ATTY. MA. VICTORIA P. DURAL	**Executive Clerk of Court II**
MS. RUBIE G. BODOTA	**Court Stenographer IV**

I. CRIMINAL CASE:

1. People of the Philippines

versus CTA CRIM. CASE No. O-969

Buensol Construction Co., Rodrigo O. Solis and Ferdinand F. Buendia

(For the initial presentation of the evidence for the prosecution)

***with Judicial Affidavit of prosecution's witness, RO Luane V. Martin executed on March 4, 2024 and filed on March 12, 2024

PP: Pros. Gen. Benedicto A. Malcontento (notified)
Asst. State Pros. John R. Resado (notified)
Atty. Victor Rico P. Lopez (notified)
Atty. Rose Ann O. Tolentino (notified)

DC: Atty. Rusell I. Gerona (notified)

Accused: Rodrigo O. Solis (notified)

II. CIVIL CASES:

1. Integrated Manufacturing Services Providers, Inc. (IMSPI), Represented by Joanne Paula B. Leonor-Mckenna

versus CTA CASE No. 11361

Commissioner of Internal Revenue, Hon. Romeo D. Lumagui, Jr.

[For the hearing of petitioner's Motion (for Suspension of Collection of Tax and Exemption from Posting of Bond) filed on December 21, 2023]

PC: Atty. Althea Barbara E. Acas (notified)
Atty. Mark Isaak S. Garrido (notified)
Atty. Ma. Aleli E. Olabre (notified)

RC: The Commissioner of Internal Revenue (notified)

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2. Metro Rail Transit Corporation

versus CTA CASE No. 11407

Commissioner of Internal Revenue

[For the hearing of petitioner's Extremely Urgent Omnibus Motion (for the Suspension of the Collection of Taxes and to Dispense with the Posting of a Bond) filed on March 8, 2024]

PC: Atty. Anthony Mark A. Gutierrez (notified)
Atty. Roxanne B. Tadique (notified)
Atty. Felicidad N. Diloy (notified)
Atty. Ma. Carla Noelle V. Fabella (notified)
Atty. Froilan Nikko R. Candelaria (notified)
Atty. Bievenido M. Co, Jr. (notified)
Atty. Arvy Keith N. Chung (notified)
Atty. Miguel Luis S. Redor (notified)
Atty. Jandilyn J. Yang (notified)

RC: Atty. Bryan Anthony C. Diego (notified)

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3. 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)

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4. Philippine Industrial Sealants
& Coating Corp.

versus CTA CASE No. 10970

Commissioner of Internal Revenue

(For the initial presentation of the evidence for the petitioner)
(For the hearing of petitioner's Motion to Commission ICPA filed on March 29, 2023)

***with Sworn Statement of petitioner's proposed ICPA, Atty. Vicente F. Rovero, Jr., executed on March 29, 2023 and attached to the Motion to Commission ICPA filed on March 29, 2023
***with Judicial Affidavit of petitioner's witness, Jay-R G. Lizardo, executed on April 16, 2024 and filed on April 16, 2024.
***with Judicial Affidavit of petitioner's witness, Mr. Irish A. Laganzon, executed on April 16, 2024 and filed on April 16, 2024.

PC: Atty. Genesis L. Sampaga (notified)
Atty. Donna Queen C. Arriola (notified)

RC: Atty. Ayesha Hania G. Matanog (notified)
Atty. Karl Kenny M. Ramo (notified)

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5. Petron Corporation

versus CTA CASE No. 11058

Commissioner of Internal Revenue

(For the continuation of the presentation of the evidence for the petitioner)

***with Judicial Affidavit of petitioner's witness, Jake Martin A. Magana, executed on December 28, 2022 and attached to the Petition for Review filed on January 3, 2023

PC: Atty. Irwin C. Nidea, Jr. (notified)
Atty. Jomel N. Manaig (notified)
Atty. Sunshine S. Red (notified)
Atty. Angelo S. Macaranas (notified)

RC: Atty. Ayesha Hania G. Matanog (notified)
Atty. Lara Nicole T. Gonzales (notified)
Atty. Niki Beryl B. Dela Cruz (notified)

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6. Abraham Holdings, Inc. (Formerly Armadillo Holdings, Inc.)

versus CTA CASE No. 11088

Commissioner of Internal Revenue

(For the presentation of the evidence for the respondent)

***with Judicial Affidavit of respondent's witness, RO Odilon Albornoz, executed on May 18, 2023 and attached to Answer filed on May 30, 2023
***Petitioner's Formal Offer of Evidence is **still pending** resolution by this Court.

PC: Atty. Christopher A. Presto (notified)
Atty. Justin Francis M. Macabuhay (notified)

RC: Atty. Anna Karenina S. Pabrua (notified)
Atty. Arlene R. Garcia-Andal (notified)

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7. National Reinsurance Corporation of the Philippines

versus CTA CASE No. 11156

Commissioner of Internal Revenue

(For the continuation of the presentation of the evidence for the petitioner)

***with Judicial Affidavit of petitioner's witness, Irene G. Lozada, executed on October 13, 2023 and attached to the Petition for Review filed on October 13, 2023
***with Judicial Affidavit of petitioner's witness, Santino U. Sontillano, executed on October 13, 2023 and attached to the Petition for Review filed on October 13, 2023
***with petitioner's Motion with Leave of Court to Admit the Amended Judicial Affidavit of Irene G. Lozada and to Set Commissioner's Hearing filed on April 12, 2024

PC: Atty. Johnsen H. Alejandro (notified)

Atty. Gene Paolo S. Guevara (notified

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

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8. Astellas Pharma Philippines, Inc.

versus CTA CASE No. 10594

Commissioner of Internal Revenue

(For the initial presentation of the evidence for the petitioner)

***with Judicial Affidavit of petitioner's witness, Ronnie C. Laurio, executed on July 19, 2021 and attached to the Petition for Review filed on July 21, 2021
***with petitioner's Manifestation with Motion for Extension of Time to Submit Final ICPA Report filed on April 12, 2024

PC: Atty. Augusto A. San Pedro, Jr. (notified)
Atty. Via Monina C. Valdepeñas (notified)
Atty. Antonio Rafael B. Ongkeko, Jr. (notified)
Atty. Armand Kevin S. Mendoza (notified)
Atty. Trisha Kaye V. Tiburcio (notified)

RC: Atty. Ayesha Hania G. Matanog (notified)
Atty. Lara Nicole T. Gonzales (notified)
Atty. Michael Kevin P. Bayona (notified)

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9. Rolex Centre Phil. Limited (Philippine Branch)

versus CTA CASE No. 11167

Commissioner of Internal Revenue

(FOR PRE-TRIAL – **Assessment Case,** previously referred to **Mediation** – **No Agreement to Mediate** was submitted on January 18, 2024)

***with petitioner's Pre-Trial Brief filed on April 12, 2024
***with Judicial Affidavit of petitioner's witness, Marivic dela Cruz, executed on May 19, 2023 and attached to the Petition for Review filed on May 25, 2023.
***with Secretary's Certificate attached to the Petition for Review filed on May 25, 2023, authorizing counsels for petitioner to appear at today's Pre-trial

***with respondent's Pre-Trial Brief filed on April 11, 2024
***with Judicial Affidavit of respondent's witness, RO Atty. Johnro Galicia, executed and attached to the Pre-Trial Brief filed on April 11, 2024
***with respondent's Special Power of Attorney attached to the Pre-Trial Brief filed on April 11, 2024, authorizing counsels for petitioner to appear at today's Pre-trial
***with respondent's Compliance filed on April 11, 2024

PC: Atty. John Christian Joy A. Regalado (notified)
Atty. Austin Claude S. Alcantara (notified)
Atty. Joel Adrian C. Alarde (notified)

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

HEARING BEFORE THE COMMISSIONER:

1. Swedish Match Philippines, Inc.

versus CTA CASE No. 11170

Commissioner of Internal Revenue

(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 1:30 p.m. to 3:30 p.m. – petitioner)
(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 3:30 p.m. to 4:00 p.m. – respondent)

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2. American Express International, Inc.

versus CTA CASE No. 11442

Commissioner of Internal Revenue

(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 1:30 p.m. to 2:00 p.m. – petitioner)

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3. Mac Graphics Carranz International Corporation, represented by: Maria Elsa Carranza Gallego

versus CTA CASE No. 11150

Commissioner of Internal Revenue

(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 2:00 p.m. to 2:30 p.m. – petitioner)
(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 2:30 p.m. to 3:00 p.m. – respondent)

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4. C&S Apparel Manufacturing, Inc.

versus CTA CASE No. 11208

Commissioner of Internal Revenue

(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 2:00 p.m. to 3:00 p.m. – petitioner)
(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 3:00 p.m. to 3:30 p.m. – respondent)

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5. Syngenta Philippines, Inc.

versus CTA CASE No. 10615

Commissioner of Customs

(Atty. Ma. Victoria P. Dural – Executive Clerk of Court II – 2:30 p.m. to 3:00 p.m. – petitioner)

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