

REPUBLIC OF THE PHILIPPINES
SUPREME COURT
Manila

EN BANC

Bagong Alyansang Makabayan
(BAYAN) Secretary General
RENATO M. REYES, JR., et al.,
Petitioners,

- versus -

G.R. No. 252733

RODRIGO R. DUTERTE, et al.,
Respondents.

X-----X

Brgy. Maglaking, San Carlos City,
Pangasinan Sangguniang Kabataan
(SK) Chairperson **LEMUEL GIO**
FERNANDEZ CAYABYAB, et al.,
Petitioners,

- versus -

G.R. No. 252921

RODRIGO R. DUTERTE, et al.,
Respondents.

X-----X

JOINT MOTION FOR LEAVE

**(To File Joint Opposition to the Urgent Motion
dated August 24, 2020 with Joint Urgent Motion to
Resolve Application for Injunctive Relief)**

PETITIONERS in G.R. No. 252733 and G.R. No. 252921, by
counsel, respectfully state:

1. Petitioners seek leave from this Honorable Court to file
their written comment and opposition to the Respondents' Urgent
Motion dated August 24, 2020, which they received last September 7,
2020 via registered mail.

2. The said Urgent Motion is litigious, considering that it seeks
to cancel the proceedings that the Honorable Court has decided to hold

in these cases for the enlightenment of the bench, the bar, and the public.

3. The immense value of conducting the said proceedings in these cases cannot be gainsaid. The law being assailed in these cases must undergo the crucible of public scrutiny through the oral arguments, in view of its devastating impact on the full enjoyment of fundamental human rights and the operation of constitutional safeguards against authoritarianism.

4. It will be in the interest of justice for Petitioners to be permitted to invoke the foregoing grounds, among others, in opposing the instant Urgent Motion.

5. Also, as it appears that the Honorable Court has not yet acted on the Petitioners' separate applications for injunctive relief against the implementation of Republic Act 11479, Petitioners would like to reiterate their arguments in support thereof and underscore their urgency.

6. Petitioners thus pray that they be allowed to file the attached *Joint Opposition to the Urgent Motion dated August 24, 2020 with Joint Urgent Motion to Resolve Application for Injunctive Relief*.

PRAYER

WHEREFORE, premises considered, Petitioners respectfully pray of this Honorable Court that they be granted LEAVE to file the attached *Joint Opposition to the Urgent Motion dated August 24, 2020 with Joint Urgent Motion to Resolve Application for Injunctive Relief*, and that the same be ADMITTED.

Other just and equitable reliefs are likewise prayed for.

Quezon City for Manila, September 14, 2020.

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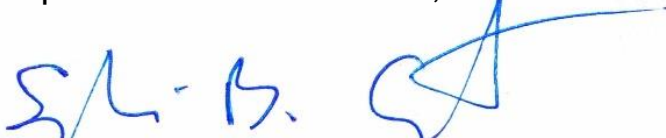
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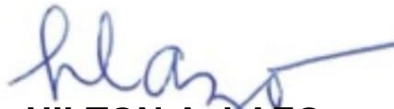
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NOTICE OF SUBMISSION

The Clerk of Court *En Banc*
Supreme Court
Manila

Greetings! Please submit the foregoing *Joint Motion for Leave to File Joint Opposition to the Urgent Motion dated August 24, 2020 with Joint Urgent Motion to Resolve Application for Injunctive Relief* for the consideration of the Honorable Court immediately upon receipt hereof.



EPHRAIM B. CORTEZ

Copy furnished:

OFFICE OF THE SOLICITOR GENERAL

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EXPLANATION OF SERVICE AND FILING

Copies of this *Joint Motion for Leave to File Joint Opposition to the Urgent Motion dated August 24, 2020 with Joint Urgent Motion to Resolve Application for Injunctive Relief* were served upon respondents and filed with the Honorable Court by electronic mail due to the quarantine limitations of the COVID-19 pandemic, time constraints and lack of personnel.



EPHRAIM B. CORTEZ