

Republic of the Philippines
SUPREME COURT
Manila

ORIGINAL

**SANLAKAS, represented by
Marie Marguerite M. Lopez,**
Petitioner,

- versus -

G.R. No. _____

**RODRIGO R. DUTERTE, as
President and Commander-in-
Chief of All the Armed Forces,
SENATE, and HOUSE OF
REPRESENTATIVES,**
Respondents.

For: *CERTIORARI* and
PROHIBITION with
Prayer for T.R.O.

X-----X

PETITION

PETITIONER SANLAKAS, by counsel, to this Honorable Supreme Court, states --

Prefatory Statement

"It is dangerous to be right in matters on which the established authorities are wrong."

- Voltaire

PARTIES

1. Petitioner is a party-list organization and multi-sectoral people's alliance organized and existing under the laws of the Republic of the Philippines with official address at 23-B Marunong Street, Brgy. Central, Quezon City. Founded in 1993, Sanlakas has been a Member of the House of Representatives for two (2) terms, in the 11th and 12th Congress, when it was represented by Congressman Renato Magtubo, Congressman Mario Cruz, and Congressman J.V. Bautista. It is represented in this petition by its President, Marie Marguerite M. Lopez;

2. Respondent Rodrigo R. Duterte is the President of the Republic of the Philippines with office address at Office of the President, Malacañang

Palace, Manila, where he may be served with summons, copy of this petition and such other process from this Supreme Court. As President, he signed into law Republic Act No. 11479 or The Anti-Terrorism Act of 2020 on July 3, 2020; and as Chief Executive and Commander-in-Chief of all the armed forces of the country, respondent will enforce and implement the said statute;

3. Respondent Senate is the Upper Chamber of the Congress of the Republic of the Philippines, which is the legislative branch of the government under **Section 2, Article VI** of our Constitution, and holds office at Senate, GSIS Building, Pasay City, where it may be served with summons, copy of this petition and such other process from this Supreme Court. Under its Constitutional functions, it will appropriate funds, with the House of Representatives, for the enforcement and implementation of Republic Act No. 11479 or The Anti-Terrorism Act of 2020;

4. Respondent House of Representatives is the Lower Chamber of the Congress of the Republic of the Philippines, which is the legislative branch of the government under **Section 5, Article VI** of our Constitution, and holds office at House of Representatives, Batasan Hills, Quezon City, where it may be served with summons, copy of this petition and such other process from this Supreme Court. Under its Constitutional functions, it will appropriate funds, with the Senate, for the enforcement and implementation of Republic Act No. 11479 or The Anti-Terrorism Act of 2020;

5. Since its founding in 1993, petitioner Sanlakas, thru its thousands of members, has been a staunch advocate of social, political, economic, cultural, and environmental changes in Philippine society, with the objective of improving the living conditions of the marginalized sectors, viz., workers, farmers, and urban poor community dwellers, and creating a just and equitable society;

6. In the process of this advocacy and its dissent against official government policies and actions, petitioner Sanlakas, thru its thousands of members, resort to mass actions, public rallies and demonstrations, workers' strikes or stoppage of work, and such other popular mobilizations for protest and dissent, with the end in view of empowering the people and pressuring the government to enact laws and policies favorable to the Filipino masses and marginalized sectors;

7. Members of petitioner Sanlakas resort to mass actions and mobilizations in the exercise of their Constitutional rights to peaceably assemble and their freedom of speech and of expression under **Section 4, Article III** of the 1987 Constitution, as a vehicle to publicly ventilate their advocacies, grievances, dissent, and, legitimate demands and to mobilize public opinion

to support the same, and to oppose policies and actions of the government which are detrimental to the rights of citizens and the welfare of the people, especially the marginalized masses;

THE CASE

8. This is a petition for *certiorari* under **Rule 65** of the 1997 Rules of Civil Procedure assailing the validity on Constitutional grounds of R.A. No. 11479 or The Anti-Terrorism Act of 2020, which was signed into law by respondent on July 3, 2020 with grave abuse of discretion amounting to a lack or excess of jurisdiction;

9. Further, this is a petition for prohibition under **Section 2, Rule 65** of the 1997 Rules of Civil Procedure to command respondent to desist from enforcing and/or implementing R.A. No. 11479 or The Anti-Terrorism Act of 2020, which was signed into law by respondent and will thereafter be enforced and implemented with grave abuse of discretion amounting to a lack or excess of jurisdiction, and allocated public funds by way of budgetary appropriation by respondents Senate and House of Representatives with grave abuse of discretion amounting to a lack or excess of jurisdiction;

10. There is no appeal or any plain, speedy, and adequate remedy available to petitioner in the ordinary course of law, except the filing of this petition;

11. At the same time, this petition seeks the issuance of Temporary Restraining Order (T.R.O.) against the respondents as members of petitioner Sanlakas stand to suffer grave injustice and irreparable damage which calls for the issuance of said Order under **Section 5, Rule 58** of the 1997 Rules of Civil Procedure;

MATERIAL ALLEGATIONS AND ARGUMENTS

***Section 4 of R.A. No. 11479 Is Void
For Being In Violation of Section 4,
Article III of the 1987 Constitution And
Under the Void-for-Vagueness Principle***

12. The Anti-Terrorism Act of 2020, specifically under its *Section 4*, declares "**advocacy, protest, dissent, stoppage of work, industrial or mass**

action, and other similar exercises of civil and political rights" as a crime of terrorism when such is "*intended to cause death or serious physical harm to a person, to endanger a person's life, or to create a serious risk to public safety*" and when its purpose "*is to intimidate the general public or a segment thereof, create an atmosphere or spread a message of fear, to provoke or influence by intimidation the government or any international organization, or seriously destabilize or destroy the fundamental political, economic, or social structures of the country, or create a public emergency or seriously undermine public safety*". This is the practical effect of the double negative formulation in Section 4 of the The Anti-Terrorism Act of 2020 which defines the crime of "terrorism";

13. Advocacy, protest, dissent, stoppage of work, and industrial or mass actions are the forms and vehicles of free speech and expression utilized by the people, including petitioner Sanlakas, in the exercise of their rights as citizens under under Section 1, Article II of the 1987 Constitution, declaring the Philippines as "a democratic and republican state" where "sovereignty resides in the people and all government authority emanates from them";

14. Advocacy, protest, dissent, stoppage of work, industrial or mass actions, and other similar exercises of civil and political rights are the forms taken in the exercise of the people's freedom of speech and expression and freedom of assembly categorically protected by Section 4, Article III of the 1987 Constitution which commands that "no law shall be passed abridging the freedom of speech, of expression, or of the press, or the right of the people peaceably to assemble and petition the government for redress of grievances";

15. The Anti-Terrorism Act of 2020, however, considers "advocacy, protest, dissent, stoppage of work, industrial or mass actions, and other similar exercises of civil and political rights" as the objective feature or overt act (*actus reus*) of the crime of terrorism if united with the subjective feature or intention (*mens rea*) "*to cause death or serious physical harm to a person, to endanger a persons life, or to create a serious risk to public safety*" and purpose (e.g., *to provoke or influence by intimidation the government, etc.*). This creates the dangerous situation where the very acts protected and guaranteed by the 1987 Constitution can actually be, as applied on the ground, interpreted or assumed --due to the vagueness of the subjective feature-- by the police and military operatives to be the crime of terrorism;

16. The subjective features of the crime of terrorism in this case (viz., intention and/or purpose) will be highly dependent on the perception of the situation or facts by the law enforcement agent or military personnel authorized in writing by the executive and all-powerful Anti-Terrorism

Council (ATC). And the absence of standards leaves such a wide latitude of discretion to law enforcement to determine whether "advocacy, protest, dissent, stoppage of work, and industrial or mass actions" are *intended* to cause the harms which the law seeks to abate. It is a fact of our life, based on long actual experience, that the police and military agents of the state have so frequently abused and misused their armed authority, especially when it comes to their dealings with workers in the picket lines, urban poor community dwellers in demolition sites, farmers demanding land ownership, and demonstrating students. Since "intent" and "purpose" are a state of the mind, they become easily susceptible to various interpretations, oftentimes, to suit a particular agenda on the part of the police and military agents, if not the government itself;

17. By way of example, since the Anti-Terrorism law makes "advocacy, protest, dissent, etc." criminal as an act of terrorism if coupled with the purpose "*to provoke or influence by intimidation the government x x x or seriously destabilize or x x x seriously undermine public safety*", what if a person, as his way of protest, denounces the President, respondent herein, on social media for his poor handling of the pandemic, the act of that person can be perceived as putting the President's life in danger (because of the public hatred it will tend to generate), thereby intending to "*provoke*" the government, which will place the act within the law's definition of terrorism;

18. In another scenario of a worker's strike, if the labor union stages a lawful strike against their employer who locks himself up in the establishment where the strike is taking place, the act of the labor unionists can be viewed as "*intending*" to endanger their employer's life or to create a serious risk to public safety, and may therefore be considered an act of terrorism, making the workers liable under the draconian law. There can be myriad of examples, and much of them will be dependent on the fertile imagination of the ATC and its police and military personnel;

19. The glaring lack of standards to definitely gauge what constitutes, "*provocation*", "*influence*", "*intimidation*", or even *destabilization*, will take free speech, free expression, and free assembly to the realm of unlawful acts should such actions put government to task, say, for its ineptitude to contain the spread and rise of covid19 contamination, if recklessly or otherwise interpreted as "*creating an atmosphere or spreading a message of fear, to provoke the government*";

20. Acts of advocacy, protest, dissent, stoppage of work, industrial or mass action, and other similar exercises of civil and political are inherently driven by individual or collective intent. The intention of advocacy is to promote a cause. The intention of protest and dissent is to express disapproval. The intention of stoppage of work, industrial or mass action, is

to seek better wages and conditions of work for the working class or redress of their grievances. They are acts which are precisely intended to bring about a desired result, including the change or reform of government policies, decisions, and actuations. More importantly, these are acts which served the Filipino people well in the dark days of the martial law regime and won them their precious freedoms. How can these Constitutionally protected and guaranteed acts now be dragged and considered as crimes of terrorism if accompanied by intent and purpose which are vague, not clearly defined, bereft of standards, and susceptible to the self-serving and gratuitous interpretations of police and military enforcers?

21. When the Anti-Terrorism law included acts which are Constitutionally protected (viz., advocacy, protest, dissent, etc.), its definition of the crime of terrorism under its *Section 4* fails to meet the Constitutional threshold of *actus reus* conduct of a crime. In The Anti-Terrorism Act of 2020, the respondents Senate and House of Representatives enacted a statute allowing law enforcement agents or military personnel to second guess the intent and purpose of a suspected person, punishing criminal intent and purpose which if made to accompany the acts protected and guaranteed under *Section 4, of Article III* of the 1987 Constitution, transforms these acts into the crime of terrorism;

22. The explicit inclusion of these constitutionally protected acts under *Section 4* renders the subsequent provisions of the law --*Sections 5 to 12* which define new crimes; *Section 16* which authorizes surveillance on suspected terrorists; *Section 25* on the designation of terrorist individuals, groups or organization; *Section 29* on warrantless arrests of suspected terrorists; and *Section 34* on the restriction of the right to travel and the incommunicado house arrest for suspected terrorists-- discretionary on the part of law enforcement and thus subject to abuse;

23. Thus, the far-reaching consequences of the definition of terrorism in *Section 4* invade into the domain of liberties and freedoms guaranteed under the present Constitution that to allow its operation would not only ultimately silence dissent but would open a Pandora's box of all forms of human rights violations against the targeted dissenter;

***R.A. No. 11479 Being a Statute
On Free Speech, Expression,
and Assembly, It is Susceptible
to A Facial Challenge; It is On
Its Face Void for Vagueness***

24. The rule established in our jurisdiction is, only statutes on free

speech, religious freedom, and other fundamental rights may be facially challenged, to the exclusion of ordinary penal statutes. It is humbly and respectfully submitted to this Honorable Supreme Court that the subject matter of the instant petition is not merely an ordinary penal statute, but one that crosses into the Constitutionally protected areas of free speech, free expression, and free assembly, thereby making R.A. No. 11479 vulnerable and susceptible to a facial challenge;

25. At the same time, R.A. No. 11479 being a criminal statute, it must be struck down as void for vagueness, specifically of its provisions in *Section 4*. In the 2015 United States case of *Johnson v. United States*¹, the US Supreme Court citing its earlier rulings in *Kolender*² and *Conally*³, ruled that the Fifth Amendment provides that “[n]o person shall ... be deprived of life, liberty, or property, without due process of law.” These cases establish that the Government violates this guarantee by taking away someone’s life, liberty, or property under a criminal law so vague that it fails to give ordinary people fair notice of the conduct it punishes, or so standardless that it invites arbitrary enforcement. The prohibition of vagueness in criminal statutes “is a well-recognized requirement, consonant alike with ordinary notions of fair play and the settled rules of law,” and a statute that flouts it “violates the first essential of due process.” The US Supreme Court has, thus, applied the vagueness doctrine to strike down penal laws for being vague as this constitutes a clear affront to the due process clause as enshrined in the Fifth Amendment. The same argument should uphold the invitation for this Honorable Supreme Court, in the exercise of its judicial review powers, to declare any penal law unconstitutional should it be infested with vague provisions that could translate into ordinary people being deprived of fair notice as to the conduct it punishes or for lack of clear and well-defined standards that it invites arbitrary enforcement;

26. The right and duty of the state to combat the scourge of terrorism must be recognized; but this can not be at the expense of our people's hard earned and hard fought Constitutional rights and freedoms. Our Constitution "is the basic and paramount law to which all other laws must conform and to which all persons, including the highest officials of the land, must defer. No act shall be valid, however nobly intentioned, if it conflicts with the Constitution. The Constitution must ever remain supreme. All must bow to the mandate of this law. Expediency must not be allowed to sap its strength nor greed for power debase its rectitude. Right or wrong, the Constitution must be upheld as long as it has not been changed by the sovereign people

¹ No. 13-7120, June 26, 2015

² *Kolender v. Lawson*, 461 U.S. 352, 357-358 (1983)

³ *Conally vs. General Construction Company*, 269 U.S. 385, 391 (1926)

lest its disregard result in the usurpation of the majesty of the law by the pretenders to illegitimate power.”⁴ Given its extreme features which border on overkill, the Anti-Terrorism law may be likened to indiscriminately firing a sub-machine gun at a crowd of innocent civilians in order to neutralize a few terrorists who are interspersed with them;

27. This Honorable Supreme Court stands as the guarantor of Constitutional and human rights of all persons within its jurisdiction and must see to it that the rights are respected and enforced. In the dark days of martial law in the '70s till the mid-'80s, the Supreme Court had, in many occasions in many cases, let our people down. Petitioner Sanlakas now runs to this Supreme Court as a court of last resort to protect it, its members, and the Filipino people from a law that will run roughshod over their rights and freedoms by declaring courageous acts of advocacy, protest, dissent, and mass actions by the Filipino people to be acts of terrorism. As the final bastion of our people's liberty and freedom, this Honorable Supreme Court now finds itself once again in the historic crossroads to restrain the heavy hands of government and protect the people's rights.

PRAYER

PREMISES CONSIDERED, petitioner Sanlakas respectfully prays of this Honorable Supreme Court to give DUE COURSE to this petition, and after due notice and hearing, ISSUE the writ of *certiorari* and DECLARE and STRIKE DOWN Section 4 of R.A. No. 11479 or The Anti-Terrorism Act of 2020 as NULL and VOID for being in violation of Section 4, Article III of the 1987 Constitution, and for being a vague provision violative of the due process rights guaranteed in the 1987 Constitution, thereby having been signed into law by respondent President Rodrigo R. Duterte with grave abuse of discretion amounting to lack or excess of jurisdiction.

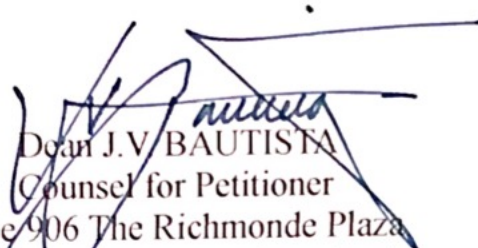
IT IS FURTHER prayed that a writ of prohibition ISSUE commanding respondent President Rodrigo R. Duterte to DESIST from enforcing or implementing Section 4 of R.A. No. 11479 or The Anti-Terrorism Act of 2020, and commanding respondents Senate and House of Representative to DESIST from allocating public funds by way of budgetary appropriation for the enforcement and implementation of the said statute.


IT IS FINALLY prayed that, after due notice and hearing, a Temporary Restraining Order (T.R.O.) be ISSUED enjoining respondent President Rodrigo R. Duterte from enforcing or implementing Section 4 of R.A. No. 11479 or The Anti-Terrorism Act of 2020, and respondents Senate


⁴ J. Cruz, Isagani

and House of Representative from allocating public funds by way of budgetary appropriation for the enforcement and implementation of the said statute.

Pasig City for Manila, July 13, 2020.


Dean J.V. BAUTISTA
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21 San Miguel Ave. cor. Lourdes Ave.
Ortigas Center, Pasig City 1605
Roll of Attorneys No. 33657
PTR No. CBN1350717 (12-26-2019)
IBP Lifetime No. 01457
MCLE Exemption No. VI-000431
As Dean of Law
Valid Until 04-14-22


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Roll of Attorneys No. 36523
PTR No. 6523077 / 1-22-20 Pasig City
IBP No. 111464 / 1-21-2020 Manila IV
MCLE Compl. No. VI-0026380 (5-8-19)


JOSE AARON M. PEDROSA, JR.
Co-Counsel for Petitioner
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Barangay Central Quezon City
Attorney's Roll No. 61770
PTR No. 9270359 / 01-02-20 Quezon City
IBP No. 094900 / 11-14-19 Pasig City
MCLE Compl. No. VI-0029316

VERIFICATION AND CERTIFICATION
OF NON-PENDENCY OF SIMILAR SUIT

I, MARIE MARGUERITE M. LOPEZ, of legal age, Filipino, with address at 89 Mariano Cuenco Street, Brgy. Sto. Domingo, Quezon City, after being duly sworn to law depose and say -- (a) I am the representative duly authorized by petitioner to sign and file the above petition; (b) I have read and understood all the allegations in the petition; (c) the allegations in the petition are true and correct based on my personal knowledge, or based on authentic documents; (d) the petition is not filed to harass, cause unnecessary delay, or needlessly increase the cost of litigation; and (e) the factual allegations therein have evidentiary support or, if specifically so identified, will likewise have evidentiary support after a reasonable opportunity for discovery.

FURTHER, I hereby certify -- (a) that I have not heretofore commenced any action or filed any claim involving the same issues in any court, tribunal or quasi-judicial agency; (b) to the best of my knowledge, no such other action or claim is pending therein; and (c) if I should thereafter learn that the same or similar action or claim has been filed or is pending, I shall report that fact within five (5) calendar days therefrom to the court wherein such aforesaid complaint or initiatory pleading has been filed.


IN WITNESS HEREOF, I have hereunto affixed my signature this 13 day of July 2020 at Quezon City,


MARGUERITE M. LOPEZ

SUBSCRIBED AND SWORN to before me this 13 day of July 2020, the affiant exhibiting to me her competent document of identity which is OSCA ID No. 03583-T.

Notary Public

Doc. No. 219
Page No. 47
Book No. 621
Series of 2020


ATTY. AZELLE PANER
NOTARY PUBLIC COMMISSION No. 2020-013
Issued on 01/20/2020 UNTIL 12/31/2021 MANILA
UNIT 237 TMM 2 TAFT AVE., MALATE, MANILA
Roll No. 4400W *IBR Lifetime No. 2022/15-12-00
PTR No. 9120231/01-07-2020 MANILA / TIN 104063310
BSCE COMPLIANCE No. VI-002222/04-14-2022

Explanation

Copies of the above pleading were served the respondents by means of LBC Courier Service instead of the preferred means of service by personal delivery by reason of the number of parties to be served and the limitations and restrictions on physical movement occasioned by the community quarantine.


Emmanuel R. Jabla

COPY SERVED BY LBC COURIER SERVICE:

President Rodrigo R. Duterte
Respondent
Office of the President
Malacañang Palace, Manila

Senate of the Philippines
Respondent
GSIS Building, Pasay City

House of Representatives
Respondent
Batasan Pambansa Building
Batasan Hills, Diliman, Quezon C

REGISTRY RECEIPT
Robinson's Ermita Postal Station
Registered Mail
Post Office _____
Letter/Package No. _____
Posted on 13 JUL 2020 20 _____
Presented by _____ of inquiry
RE 240 647 544 ZZ

Postmaster/Teller _____

REGISTRY RECEIPT
Robinson's Ermita Postal Station
Registered Mail
Post Office _____
Letter/Package No. _____
Posted on 13 JUL 2020 20 _____
Presented by _____ of inquiry
RE 240 647 535 ZZ

Postmaster/Teller _____

REGISTRY RECEIPT
Robinson's Ermita Postal Station
Registered Mail
Post Office _____
Letter/Package No. _____
Posted on 13 JUL 2020 20 _____
Presented by _____ inquiry
RE 240 647 527 ZZ

Postmaster/Teller _____

Republic of the Philippines)
CITY OF MANILA) s.s.

AFFIDAVIT OF SERVICE

I, FEDERICO PUNZAL, of legal age, married and a resident of Quezon City, after having been duly sworn to law hereby depose and say that:

1. On 13 July 2020, I caused the service of a copy of the Petition dated dated July 13, 2020 in Sanlakas v. Rodrigo Duterte, et al. to:

President Rodrigo R. Duterte
Office of the President
Malacañang Palace, Manila _____

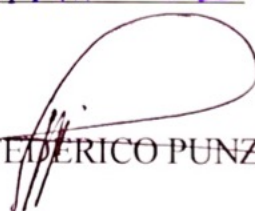
Senate of the Philippines
GSIS Building, Pasay City _____

House of Representatives
Batasan Pambansa Building
Batasan Hills, Diliman
Quezon City _____

by means of ~~LBC~~ ^{REGISTERED MAIL} courier services.

2. I have executed this affidavit to attest to the truth and veracity of foregoing statements.

^{JUL 13 2020} WITNESS WHEREOF, I have hereunto affixed my signature this _____ day of July 2020 at CITY OF MANILA


FEDERICO PUNZAL

SUBSCRIBED AND SWORN to before me this ^{JUL 13 2020} _____ day of July 2020 at CITY OF MANILA by the affiant who presented his Id. No. 1107-98-420713.

Doc. No. 228 Page No. 417
Book No. 52 Series of 2020

Notary Public ^{JOSE E. PAMER}
NOTARY PUBLIC COMMISSION No. 2020-013
Issued on 01/20/2020 UNTIL 12/31/2021 MANILA
UNIT 237 TMK 2 TAFT AVE., MALATE, MANILA
Roll No. 44009 *TSP Lifetime No 2022/15-12-00
PTR No 9170231/01-02-2020 MANILA / TIN 104053319
MCLE COMPLIANCE No. VI-MC2222/04-14-2022

REPUBLIC OF THE PHILIPPINES)
City of Manila) S.s.

SECRETARY'S CERTIFICATE

I, **JOSE AARON PEDROSA, JR.**, of legal age, Filipino, and with office address at 23-B Marunong Street, Barangay Central, Quezon City 1100, after being duly sworn in accordance with law, depose and state that:

1. I am the duly elected Secretary-General (Secretary-equivalent) of **SANLAKAS**, an organization duly organized and existing under and by virtue of the laws of the Republic of the Philippines, with office address at 23-B Marunong Street, Barangay Central, Quezon City 1100;
2. I am the custodian of records of Sanlakas, including the Minutes and Resolutions of its National Council (Board of Trustees-equivalent); and
3. At the special meeting through videoconferencing of the National Council of Sanlakas held on 8 July 2020, during which a quorum was present and acted throughout, the following resolution was unanimously adopted:

Resolution

RESOLVED, that **MARIE MARGUERITE M. LOPEZ** is hereby authorized to bring, file, initiate, and institute a Petition for Certiorari and Prohibition against President Rodrigo Duterte, the Senate of the Philippines and the House of Representatives assailing the constitutionality of Republic Act 11479 or the Anti-Terrorism Act of 2020 with Prayer for Issuance of Temporary Restraining Order, and other available and appropriate remedies, before the Supreme Court, with full and special power and authority to:

- a. Cause and authorize the preparation and filing of all pleadings, motions, memoranda, affidavits, and such other papers or documents as may be needed in the course of the proceedings;
- b. Sign and execute all verifications and certifications of non-forum shopping and other procedural requirements for pleadings filed on behalf of Sanlakas;
- c. Appear for and in behalf of Sanlakas in all mediation proceedings and judicial dispute resolution hearings or similar proceedings;
- d. Enter into amicable settlements or compromises;
- e. Submit to alternative modes of dispute resolution;
- f. Enter into stipulations or admissions of facts and of documents;
- g. Exercise acts enumerated under Section 2, Rule 18 of the Revised Rules of Court;
- h. Appoint and secure the services of legal counsel or attorney-at-law to represent Sanlakas in the above-mentioned actions; and

2.

- i. Do and perform all and every act and thing whatsoever requisite and necessary to be done in and about the premises.

HEREBY GIVING AND GRANTING unto the said person full power and authority to do and perform all and every act and thing whatsoever requisite and necessary to be done in and about the premises and hereby ratifying and conforming all that the said person has done or caused to do and shall lawfully do or cause to be done by virtue of this authority;

RESOLVED FINALLY, that the legal services of **J.V. BAUTISTA, EMMANUEL R. JABLA AND JOSE AARON M. PEDROSA, JR.** are hereby engaged for the above-mentioned actions.

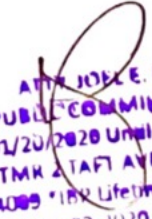
4. The said Resolution is still in force and has not been amended and revoked;
5. I am executing this Certificate for whatever legitimate purpose it may serve.

IN WITNESS WHEREOF, I have hereunto affixed my signature on 13 July 2020 at Manila, Philippines.


JOSE AARON PEDROSA, JR.
Affiant

SUBSCRIBED AND SWORN to before me, a Notary Public for Manila on 13 July 2020 at Manila, Philippines, by affiant, who personally appeared before me and exhibited his competent evidence of identity: Passport No. EC7873708 which will expire on 31 May 2021.

Doc. No.: 027 ;
Page No.: 47 ;
Book No.: 541 ;
Series of 2020.


ATTY. JOLIE PANER
NOTARY PUBLIC COMMISSION No. 2020-015
Issued on 01/20/2020 Until 12/31/2021 MANILA
UNIT 237 TMK 2 TAFT AVE., MALATE, MANILA
Roll No. 44089 *IBX Lifetime No. 2022/15-12-00
PTR No. 9120231/01-02-2020 MANILA / TIN 104063390
MCLE COMPLIANCE No. 44-44-2020

VERIFIED DECLARATION

I, J.V. BAUTISTA, hereby declare that the PETITION hereto submitted contained in a USB flash drive in PDF format in accordance with A.M. Nos. 10-3-7-SC and 11-9-4-SC is a complete and true copy of the document filed with the Supreme Court.



J.V. BAUTISTA

JUL 13 2020

SUBSCRIBED AND SWORN TO before me on this ____ day of July 2020 by the affiant who presented to me her IBP Roll No. 33657.

Notary Public

Doc. No. 228
Page No. 97
Book No. 501
Series of 2020


JOEL E. PANER
NOTARY PUBLIC COMMISSION No. 2020-013
Issued on 01/20/2020 UNTIL 12/31/2021 MANILA
UNIT 237 TMR 2 EAST AVE., MALATE, MANILA
Roll No. 44009 *IBP Lifetime No. 2022/15-12-00
PTR No. 9120231/01-02-2020 MANILA / TIM 104063310
MGLC COMPLIANCE No. VI-002222/04-14-2023