

ORIGINAL
FILED BY: *[Signature]*
DATE: 3-16-2020

Republic of The Philippines
SUPREME COURT
Manila

REPUBLIC OF THE PHILIPPINES
SUPREME COURT
ORIGINAL
2020 MAR -6 PM 2:43

Third Division

SUPREME COURT OF THE PHILIPPINES
PUBLIC INFORMATION OFFICE
RECEIVED
MAR 11 2020
BY: _____
TIME: _____

3

JODY C. SALAS, ex rel Person
Deprived of Liberty (PDL)
RODOLFO C. SALAS,

Petitioner, SC G.R. SP PROC. No. 251693

-versus-

FOR: *HABEAS CORPUS, TRO*
and INJUNCTION AND ALL
OTHER LEGAL AND
EQUITABLE REMEDIES

HON. THELMA
BUNYI-MEDINA, Presiding
Judge of the Regional Trial Court
of the City of Manila, Branch 32,
JCINSP. LLOYD GONZAGA,
Warden of the Manila City Jail
Annex, and all those taking
orders, instructions, and
directions from him,

Respondents.

NO CD FILED
POSTED
ORIGINAL
AND

x-----x

EX-PARTE MANIFESTATION

Petitioner, by counsel, respectfully states that:

Service of the Petition

1. On 24 February 2020, Petitioner filed with this Honorable Court a Petition to free Mr. Rodolfo C. Salas from continuing illegal confinement under Rule 102 of the Rules of Court, with application for a Temporary Restraining Order and Writ of Preliminary Injunction.

2. In view of the urgency of the matter and to give Respondents sufficient notice of the filing of the Petition, Petitioner served all of the Respondents copies of the said

[Handwritten signature]

Petition through licensed private courier (LBC) on 24 February 2020, as shown in the attached transaction receipt.¹

3. However, upon checking with the licensed private courier, Petitioner was informed that only the Office of the Solicitor General was actually served a copy of the Petition on 26 February 2020.

4. Hence, Petitioner personally served copies of the Petition to Respondents Hon. Thelma Bunyi-Medina, Presiding Judge of the Regional Trial Court of the City of Manila, Branch 32 and JCINSP. Lloyd Gonzaga, Warden of the Manila City Jail Annex on the 28th and 29th of February, 2020, respectively.²

Transfer of Detention

5. On 3 March 2020, Rodolfo Salas was transferred from the Manila City Jail Annex in BJMP-NCR Compound, Camp Bagong Diwa, General Santos Ave., Lower Bicutan Taguig City to the **Manila City Jail Proper in 851 Oroquieta St, Santa Cruz, Manila, 1003 Metro Manila.**

6. Therefore, the Petitioner respectfully requests this Honorable Court to send all notices or summons to the Officer-In-Charge of the Manila City Jail Proper in the above-stated address.

Respectfully submitted. . .

Quezon City for Manila City, 06 March 2020.

FREE LEGAL ASSISTANCE GROUP (FLAG)

Counsel for Petitioner-Relator Jody Salas
2nd Floor, Eastside Building
77 Malakas Street, Quezon City, PHL 1100

JOSE MANUEL I. DIOKNO, National Chairperson
THEODORE O. TE, Regional Coordinator for Metro Manila

¹ See Annex "A".

² A copy of page 19 of the Petition with proof of receipt by Respondents is attached as Annex "B".

BY

JOSE MANUEL I. DIOKNO

Roll No. 35394

PTR No. 9668094/February 4, 2020/Quezon City

IBP Lifetime No. 00236/February 9, 1995/Pasig City

MCLE Exemption No. VI-000914 (Valid until April 14, 2020)

BM2012 Mandatory Legal Aid Service Exempt - Free Legal
Assistance Group

Email: flag@flag.com.ph

THEODORE O. TE

SC Roll No. 37142

PTR No. 9542333 / January 24, 2020 / Quezon City

IBP No. 112306 / January 24, 2020 / Makati City

MCLE Exemption No. VI-001316 (Valid until 4-14-22)

BM 2012 MLAS Exempt-Free Legal Assistance Group

Tel No. 89205514 loc. 418/CP-09175202295

Theodore.te@gmail.com

MICHAEL CHRISTOPHER C. DE CASTRO

Roll of Attorneys No. 68718

PTR No. 9343828/ January 6, 2020/Quezon City

IBP No. 111122/January 20, 2020/Bicolandia/Masbate

MCLE Compliance No. VI-0026337/May 8, 2019 - April 14,
2022

Email: mcdc@leflegis.com

CP. No.: 0995 651 2090

ANNEX 'A'

SHIPPER:
FREE, LEGAL ASSISTANCE GROUP
Address: 77 MALAKAS ST, PINYAHAN
QUEZON CITY, METRO MANILA
Contact No. (s): 9228524009
Card Number: TIN:

CONSIGNEE:
And or/ care of:
OFFICE OF THE SOLICITOR GENERAL
Address: NO 134 AMORSOLO ST
LEGASPI VILLAGE
MAKATI CITY, METRO MANILA
Contact No. (s): 8991670 / 9228624009

Courier N-Pouch SS

Origin : MMA-KANSA-V. LUNA
Tran. Date : 02/24/2020 01:04:21 PM
Delivery Date : 02/25/2020
Area Dest. : METRO MANILA
Tran. Type : Delivery
Cut-off : 07:00 PM
Actual Wt (Kg.) : 0.00

VATable(Freight) : 142.00
VAT-Exempt : 0.00
VAT Zero-Rated : 0.00
10AM Pickup Fee : 0.00
Discount : 0.00
Total Sales : 142.00
12% VAT : 17.14
Amount Due : 160.00
Mode : CASH

Track your padala at:
www.lbcexpress.com
Talk to our Care Representative
www.lbcexpress.com
Tel. (632) 8858-5999
1-800-10-8585-999
*Only for PH outside NCR
Let us know of your experience:
survey.lbcexpress.com

Said to Contain : DOCS
SUBJECT FOR DELAY

LBC Express values your privacy. For more info on our privacy policy
visit www.lbcexpress.com/privacy-policy
SHIPPER WARRANTS THAT THE SHIPMENT HAS NO CASH INSIDE CLAIMS OF CARGO ARE
LIMITED UP TO ACTUAL DECLARED VALUE ONLY
I hereby agree to be bound with the terms and conditions written at the
back set forth by LBC EXPRESS.

MINA JORDAN JAMES CANIAL
Signature of Associate

FREE, LEGAL ASSISTANCE GROUP
Signature of Shipper

OR Series No : KAN041000000001 to KAN0489999999999 BIR Final PTUN:FP02015-122-0047707-00304
BIR Accreditation No: 1220007821402015060310 Date Issued: 06/26/2015 valid until 06/25/2020
THIS INVOICE/RECEIPT SHALL BE VALID FOR FIVE(5) YEARS FROM THE DATE OF THE PERMIT TO USE.

LBC EXPRESS, INC.
18 EAST AVENUE CORNER V. LUNA ROAD, PINTO
ANAN, QUEZON CITY
Tel. No. : (632) -
TIN No. : 000-702-140-00304



RE-PRINTED:
THIS SERVES AS AN OFFICIAL RECEIPT
MIN
Serial No : 15000617124916274
Official Receipt No : BAXY61V
KAM0410000302021

SHIPPER:
FREE, LEGAL ASSISTANCE GROUP
Address: 77 MALAKAS ST, PINYAHAN
QUEZON CITY, METRO MANILA
Contact No. (s): 9228524009
Card Number: TIN:

CONSIGNEE:
And or/ care of:
BUNYI MEDINA, THELMA
Address: 5/F LRT WING, MANILA CITY HALL, GAT ANTONI
O VILLEGAS ST
ERMITA/MALATE BOUNDARIES, MANILA CITY, METRO MANILA
Contact No. (s): 9228524009

Courier N-Pouch SS

Origin : MMA-KANSA-V. LUNA
Tran. Date : 02/24/2020 01:52:33 PM
Delivery Date : 02/25/2020
Area Dest. : METRO MANILA
Tran. Type : Delivery
Cut-off : 07:00 PM
Actual Wt (Kg.) : 0.00

VATable(Freight) : 142.00
VAT-Exempt : 0.00
VAT Zero-Rated : 0.00
10AM Pickup Fee : 0.00
Discount : 0.00
Total Sales : 142.00
12% VAT : 17.14
Amount Due : 160.00
Mode : CASH

Track your padala at:
www.lbcexpress.com
Talk to our Care Representative
www.lbcexpress.com
Tel. (632) 8858-5999
1-800-10-8585-999
*Only for PH outside NCR
Let us know of your experience:
survey.lbcexpress.com

Said to Contain : DOCS
SUBJECT FOR DELAY

LBC Express values your privacy. For more info on our privacy policy
visit www.lbcexpress.com/privacy-policy
SHIPPER WARRANTS THAT THE SHIPMENT HAS NO CASH INSIDE CLAIMS OF CARGO ARE
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I hereby agree to be bound with the terms and conditions written at the
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MINA JORDAN JAMES CANIAL
Signature of Associate

FREE, LEGAL ASSISTANCE GROUP
Signature of Shipper

OR Series No : KAN041000000001 to KAN0489999999999 BIR Final PTUN:FP02015-122-0047707-00304
BIR Accreditation No: 1220007821402015060310 Date Issued: 06/26/2015 valid until 06/25/2020
THIS INVOICE/RECEIPT SHALL BE VALID FOR FIVE(5) YEARS FROM THE DATE OF THE PERMIT TO USE.

LBC EXPRESS, INC.
18 EAST AVENUE CORNER V. LUNA ROAD, PINTO
ANAN, QUEZON CITY
Tel. No. : (632) -
TIN No. : 000-702-140-00304



RE-PRINTED:
THIS SERVES AS AN OFFICIAL RECEIPT
MIN
Serial No : 15000617124916274
Official Receipt No : BAXY61V
KAM0410000302020

SHIPPER:
FREE, LEGAL ASSISTANCE GROUP
Address: 77 MALAKAS ST, PINYAHAN
QUEZON CITY, METRO MANILA
Contact No. (s): 9228524009
Card Number: TIN:

CONSIGNEE:
And or/ care of:
GONZAGA, LLOYD
Address: BUMP-NCR COMPD. CAMP BAGONG DIWA GENERAL S
ANTAG AVE, LOWER BICUTAN
TAGUIG CITY, METRO MANILA
Contact No. (s): 9228524009

Courier N-Pouch SS

Origin : MMA-KANSA-V. LUNA
Tran. Date : 02/24/2020 01:46:07 PM
Delivery Date : 02/25/2020
Area Dest. : METRO MANILA
Tran. Type : Delivery
Cut-off : 07:00 PM
Actual Wt (Kg.) : 0.00

VATable(Freight) : 142.00
VAT-Exempt : 0.00
VAT Zero-Rated : 0.00
10AM Pickup Fee : 0.00
Discount : 0.00
Total Sales : 142.00
12% VAT : 17.14
Amount Due : 160.00
Mode : CASH

Track your padala at:
www.lbcexpress.com
Talk to our Care Representative
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Tel. (632) 8858-5999
1-800-10-8585-999
*Only for PH outside NCR
Let us know of your experience:
survey.lbcexpress.com

Said to Contain : DOCS
SUBJECT FOR DELAY

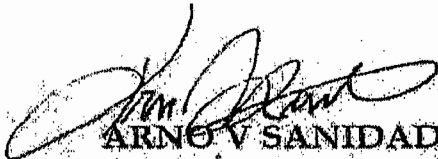
LBC Express values your privacy. For more info on our privacy policy
visit www.lbcexpress.com/privacy-policy
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I hereby agree to be bound with the terms and conditions written at the
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MINA JORDAN JAMES CANIAL
Signature of Associate

FREE, LEGAL ASSISTANCE GROUP
Signature of Shipper

OR Series No : KAN041000000001 to KAN0489999999999 BIR Final PTUN:FP02015-122-0047707-00304
BIR Accreditation No: 1220007821402015060310 Date Issued: 06/26/2015 valid until 06/25/2020
THIS INVOICE/RECEIPT SHALL BE VALID FOR FIVE(5) YEARS FROM THE DATE OF THE PERMIT TO USE.

ANNEX "B"


ARNO V. SANIDAD

Roll of Attorneys No. 31374

PTR No. 9269748/01-02-20/Quezon City

IBP Lifetime Roll No. 07913/01-09-09/Ilocos Sur

MCLE Exemption No. VI-001428/Valid until 04-14-22

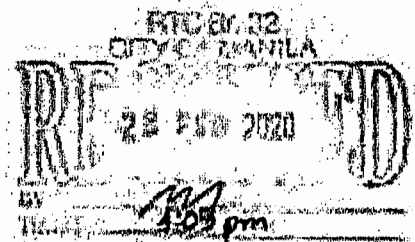
Tel No. 89200044/89200177

Email: lawyers@sanidalawfirm.com


Copy Furnished:

THE OFFICE OF THE SOLICITOR GENERAL
134 Amorsolo Street, Legaspi Village
Makati City

HON. THELMA BUNYI-MEDINA
Presiding Judge, RTC Manila, Branch 32
5F, LRT Wing, Manila City Hall, Gat
Antonio Villegas St., Ermita, City of
Manila, Metro Manila



JCINSP. LLOYD GONZAGA
Warden of the Manila City Jail Annex
BJMP-NCR Compound, Camp Bagong
Diwa, General Santos Ave., Lower
Bicutan Taguig City, Metro Manila.

Received by:

Jey IRIS APODACA
2/24/2020

VERIFIED DECLARATION

I, **ATTY. MICHAEL CHRISTOPHER C. DE CASTRO**, hereby declare that the document hereto submitted electronically in accordance with the Efficient Use of Paper Rule, are complete and true copies of the document filed with the Supreme Court.



ATTY. MICHAEL CHRISTOPHER C. DE CASTRO

Counsel for Petition

6 March 2020

SUBSCRIBED AND SWORN to before me this MAR 06 2020, affiant exhibiting his competent evidence of identity, to wit: IBP ID No. 68718 valid until 13 September 2012 issued at Masbate.

Doc No. 291
Page No. 99
Book No. II
Series of 2020.


ATTY. RUBEN M. AZANES JR.
NOTARY PUBLIC
UNTIL DECEMBER 31, 2020
ADM. MATTER NO. NP-053 (2019-2020)
PTR NO. 9269843/01-02-2020/Q.C.
IBP NO. AR 54011860/01-02-2020/Q.C.
ROLL NO. 46427
MCLE Compliance No. VI-0030360
TIN:140-394-836-000
Office Address: Agora, Camp Crane, Quezon City