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SUPREME COURT  
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2023 DEC 29 AM 10: 22

Republic of the Philippines  
SUPREME COURT  
*En Banc*  
Manila

SMARTMATIC  
CORPORATION,  
SMARTMATIC PHILIPPINES,  
INC.

TIM  
AND

*Petitioners,*

**G.R. No. 270564**

For: Petition for *Certiorari* under Rule 65 of the Rules of Court with Prayer for the Issuance of a Temporary Restraining Order and/or Writ of Preliminary Injunction with urgent motion for special raffle

*-versus-*

COMMISSION  
ON  
ELECTIONS *EN BANC*, ELISEO  
MIJARES RIO JR, AUGUSTO  
CADELIÑA  
LAGMAN,  
FRANKLIN FAYLOGA YSAAC  
AND LEONARDO OLIVERO  
ODOÑO

*Respondents,*

x-----x

**OPPOSITION**

**(TO: OMNIBUS MOTION (i) FOR THE RECONSIDERATION OF THE HONORABLE COURT'S ORDER DATED 18 DECEMBER 2023; AND (II) FOR AN ADDITIONAL PERIOD TO FILE COMMENT DATED 28 DECEMBER 2023)**

Petitioners SMARTMATIC TIM CORPORATION ("Smartmatic TIM") and SMARTMATIC PHILIPPINES, INC. ("Smartmatic PH") (collectively, the "Petitioners" or "Smartmatic"), by counsel, respectfully state:

1. On 28 December 2023, Petitioners, through counsel, received the Public Respondent Commission on Elections' (the "COMELEC") *Omnibus Motion (i) For the Reconsideration of the Honorable Court's Order dated 18 December 2023; and (ii) For an Additional Period to File Comment* of even date ("Omnibus Motion"). Through the Omnibus Motion, the COMELEC prays that this Honorable Court's

*Order* dated 18 December 2023 (“*Order*”) be reconsidered insofar as it ordered the Respondents to file a “comment on the petition and prayer for TRO and writ of preliminary injunction within a **non-extendible period of 10 days from notice**”<sup>1</sup> and in turn the COMELEC prays that this Honorable Court “grant an extension of seven (7) days, or until January 4, 2024, within which to file its Comment.”<sup>2</sup>

2. Petitioners take great exception to the Omnibus Motion as there is no basis in law or equity to grant the same. Worse, it is clear that the Omnibus Motion is a *pro forma* and dilatory motion, and nothing more than a scheme to further deprive Petitioners of its rights while pre-empting and circumventing this Honorable Court’s authority.

3. To recall, on 29 November 2023, Smartmatic received the *Resolution* dated 29 November 2023 (“*Assailed Resolution*”) issued by the COMELEC, disqualifying Smartmatic from participating in the procurement process for the 2025 Automated Election System (“2025 AES”).

4. The decision of the COMELEC came just days before the scheduled submission of bids for the 2025 AES on 12 December 2023 (subsequently moved to 14 December 2023), leaving Smartmatic with a very little window to assail its baseless disqualification.

5. In view of the urgency of the matter, Smartmatic, on 7 December 2023, filed a *Petition for Certiorari (with Extremely Urgent Application for the Issuance of a Temporary Restraining Order and/or Writ of Preliminary Injunction) with Urgent Motion for Special Raffle* dated 6 December 2023 (the “*Petition*”) (i) seeking to annul and set aside the *Assailed Resolution* for having been issued with grave abuse of discretion, amounting to lack or excess of jurisdiction; and (ii) praying for the issuance of a temporary restraining order (“TRO”) and/or a writ of preliminary injunction (“WPI”) enjoining the COMELEC (*En Banc*) and anyone acting for or under its authority, direction, control, or instruction, including the Special Bids and Awards Committee (“SBAC”) for the 2025 AES, from performing any act in connection with or pursuant to the *Assailed Resolution*.

6. Subsequent to the filing of the *Petition*, and pending this Honorable Court’s review thereof, the COMELEC nevertheless

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<sup>1</sup> *Order* dated 18 December 2023.

<sup>2</sup> *Omnibus Motion (i) for the Reconsideration of the Honorable Court’s Order dated 18 December 2023; and (ii) For an Additional Period to File Comment of even date (“Omnibus Motion”), p. 2, par. 3.*

proceeded with the submission of bids for the procurement process for the 2025 AES on 14 December 2023 where it proceeded to implement the Assailed Resolution and unjustly expanded its application to SMMT-TIM 2016 Inc.

7. Records show that the opening of bids proceeded with the participation of only one (1) bidder: Miru Systems (“Miru”). The SBAC, however, declared a failure of bidding due to Miru’s failure to comply with the requirements under Republic Act 9184 and its Implementing Rules and Regulations. With the declaration of a failed bidding, it was then announced that **bidding will be conducted anew on 4 January 2024<sup>3</sup> (subsequently moved to 8 January 2024).**<sup>4</sup>

8. In view of the supervening events, on 18 December 2023, Smartmatic filed its *Manifestation and Supplement to the Petition for Certiorari dated 6 December 2023 (With Application for the Issuance of a Status Quo Ante Order)* of even date (“Manifestation and Supplement”).

9. Considering the new bidding date, it is not a coincidence that the COMELEC now requests the extension of the period to comment to 4 January 2024, the very day of the original scheduled bidding (now merely four (4) days away from the extended/rescheduled submission of bids on 8 January 2024). This is consistent with the COMELEC’s past actions intended to frustrate Smartmatic’s right to participate in the procurement process for the 2025 AES.

10. It should not escape this Honorable Court that even assuming that there are indeed logistical difficulties in collating the requested documents, it was incumbent upon the COMELEC to readily and immediately inform this Honorable Court of its inability to comply with the 28 December 2023 deadline. Instead, the COMELEC chose to wait out its period and file the present Omnibus Motion on the last day of its deadline. Clearly, the present Omnibus Motion is a dilatory motion which this Honorable Court has consistently frowned upon.<sup>5</sup>

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<sup>3</sup> See Rappler, Dwight de Leon, Why Comelec threw out lone bid proposal for its 2025 full automation project *available at* <https://www.rappler.com/newsbreak/explainers/why-comelec-threw-out-lone-bid-proposal-full-automation-project-system/> (last accessed on 16 December 2023).

<sup>4</sup> See PhilStar, Rhodina Villanueva, Comelec extends bids deadline for 2025 polls system *available at* <https://www.philstar.com/headlines/2023/12/24/2321070/comelec-extends-bids-deadline-2025-polls-system> (last accessed on 29 December 2023).

<sup>5</sup> See *Ultra Mar Aqua Resource, Inc. v. Fermida Construction Services*, G.R. No. 191353, 17 April 2017, 822 SCRA 578. See also *Millare v. Montero*, A.C. No. 3283, 13 July 1995, 246 SCRA 1.

11. At any rate, the reason proffered by the Office of the Solicitor General (“OSG”), as counsel of the COMELEC, can hardly be considered sufficient to warrant the extension sought through the Omnibus Motion.

12. *First.* It is expressly stated in this Honorable Court’s Order, that the ten (10)-day period given to the COMELEC to file a comment is **non-extendible**. Notably, the COMELEC, in its Omnibus Motion, fails to present any legal argument as to why the express directive in the Order should be reconsidered. Guidance may be had from Section 2, Rule 37 of the Rules of Court, requiring that a motion for reconsideration point out specific findings or conclusions which are contrary to law.<sup>6</sup> To this end, this Honorable Court has emphasized that any motion for reconsideration which does not comply with the cited rule, fails to substantiate the alleged error, or merely alleges that a decision is contrary to law is a *pro forma* motion:<sup>7</sup>

“Among the ends to which a motion for reconsideration is addressed, one is precisely to convince the court that its ruling is erroneous and improper, contrary to the law or the evidence; and in doing so, the movant has to dwell of necessity upon the issues passed upon by the court. If a motion for reconsideration may not discuss these issues, the consequence would be that after a decision is rendered, the losing party would be confined to filing only motions for reopening and new trial.

**Indeed, in the cases where a motion for reconsideration was held to be pro forma, the motion was so held because (1) it was a second motion for reconsideration, or (2) it did not comply with the rule that the motion must specify the findings and conclusions alleged to be contrary to law or not supported by the evidence, or (3) it failed to substantiate the alleged errors, or (4) it merely alleged that the decision in question was contrary to law, or (5) the adverse party was not given notice thereof.”<sup>8</sup>**

13. In the case at hand, the COMELEC not only failed to comply with the required contents of a motion for reconsideration but also failed to allege why the directive of this Honorable Court to comment on the Petition within a non-extendible period is contrary to

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<sup>6</sup> RULES OF COURT, Rule 37, Sec. 2.

<sup>7</sup> Coquilla v. Commission on Elections and Alvarez, G.R. No. 151914, 31 July 2002, 385 SCRA 607.

<sup>8</sup> Emphasis and underscoring supplied.

law. As such, the Omnibus Motion, being *pro forma*, is a mere scrap of paper that does not deserve any consideration.<sup>9</sup>

14. *Second.* While it is true that it is a familiar and fundamental rule that a motion for extension of time to file a pleading is best left to the sound discretion of the court and an extension may be allowed for good and sufficient reason if the motion is filed before the expiration of the time sought to be extended,<sup>10</sup> this only applies in cases where there is no express prohibition against a motion for extension of time or where the period provided by the Rules or by the court is not non-extendible. Logically, when the period to comply is non-extendible, such as in this case, there is no room to argue on the basis of good and sufficient reasons. In any case, **even assuming an extension may be granted for a non-extendible period, the COMELEC utterly failed to provide good and sufficient reasons and merely stated that it will not be able to comply with the deadline set by this Honorable Court because of the voluminousness of the records of this case.**

15. While Petitioners empathize with the predicament of the OSG, it is readily apparent from the Omnibus Motion that the delays were created by none other than the COMELEC itself, undertaking to provide the necessary documents only on 27 December 2023, or one day before the deadline to file the Comment through its Letter-Reply dated 22 December 2023.<sup>11</sup>

16. While the COMELEC received this Honorable Court's Order on 18 December 2023, it had already been served twice with the full Petition and its annexes **as early as 8 December 2023.**<sup>12</sup> In fact, on 11 December 2023, COMELEC Chairman George Garcia expressly acknowledged the filing of the Petition and stated that "[t]his is expected. The Comelec is willing and ready to defend its position. At the end of the day, the SC has the final say on the matter",<sup>13</sup> and again during the bidding on 14 December 2023, where the COMELEC directed the SBAC not to accept bids from any Smartmatic entity unless a Temporary Restraining Order was issued by this Honorable Court in relation to this very proceeding. It is therefore unfathomable that the COMELEC is now claiming that it requires more time to merely collate its documents when it had more than sufficient

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<sup>9</sup> Reyes v. People of the Philippines, G.R. No. 193034, 20 July 2015, 763 SCRA 226.

<sup>10</sup> Fluor Daniel Inc v. Fil-Estate Properties Inc., G.R. No. 212895, 27 November 2019, 926 SCRA 82.

<sup>11</sup> See Annex "2" of the Omnibus Motion.

<sup>12</sup> A copy of the LBC tracking page showing the service to the COMELEC, with the tracking number 321286394486, is attached hereto as Annex "A" and made an integral part hereof.

<sup>13</sup> See Smartmatic raises Comelec's DQ ruling before Supreme Court, 11 December 2023, available at <https://newsinfo.inquirer.net/1873841/smartmatic-raises-comelecs-dq-ruling-before-supreme-court> (last accessed on 28 December 2023).

opportunity to prepare. The COMELEC even stresses the “significance of the issues at hand”<sup>14</sup> yet they betray their candor with their inaction and indifference to the urgency of the case *a quo*.

17. In *Philippine National Bank v. Deang Marketing Corp.* (“*Philippine National Bank*”),<sup>15</sup> the Supreme Court, in affirming the denial of the petitioner’s Motion for Extension to File Answer, took notice of the inexcusable delay of the petitioner in filing the answer within the prescribed period and stressed the compliance with the periods set under the Rules of Court, *viz*:

“In the present case, no satisfactory reason was adduced to justify the tardiness of the Answer and no compelling reason was given to justify its admission. The intention to delay was rather obvious.

It is not amiss to mention at this juncture that the Court’s attention has been drawn to the fact that petitioner's counsel even notarized the Verification of respondents' Complaint as well as the Corporate Secretary's Certificate as early as April 10, 2006. By such act, which is irregular, to say the least, petitioner's counsel was even made aware in advance of the impending filing of the case against her client-herein petitioner.

Moreover, petitioner's handling counsel belongs to its Legal Department which monitors its pending cases and oversees a network of lawyers.

On petitioner’s counsel’s belated and trite allegation of heavy volume of work which called for the filing of the Motion for Extension, nowhere is it therein claimed that there was heavy volume of work in other equally important cases. With the implication that petitioner had been all the while preparing an Answer, it defies comprehension how petitioner still attributes the delay to “inadvertence,” “honest oversight” and “simple remission” in its having allegedly misplaced the Motion for Extension.

**The Court thus finds petitioner’s negligence inexcusable, as the circumstances behind and the reasons for the delay are detestable.**

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<sup>14</sup> See Omnibus Motion, p.2, par. 3.

<sup>15</sup> G.R. No. 177931, 8 December 2008, 573 SCRA 312.

Rules of procedure, especially those prescribing the time within which certain acts must be done, have often been held as absolutely indispensable to the prevention of needless delays and to the orderly and speedy discharge of business. The bare invocation of "the interest of substantial justice" is not a magic wand that will automatically compel this Court to suspend procedural rules."<sup>16</sup>

18. Similar to *Philippine National Bank*, the COMELEC already had in its possession a copy of the Petition as early as 8 December 2023 and, thus, had more than an ample time to prepare its defenses against Smartmatic's claims. Further, the COMELEC has its own Legal Department and network of lawyers which likewise oversees the necessary preparation of all its legal filings, apart from the OSG. It becomes all the more apparent, therefore, that the Omnibus Motion is purely dilatory. **Worse, the COMELEC even asked to file its Comment until 4 January 2024 which is the exact date of the originally scheduled submission of bids subject of the very Petition and Manifestation and Supplement, and which is now only four (4) days away from the extended/rescheduled deadline on 8 January 2024.** It is clear that the COMELEC's acts, specifically the filing of the Omnibus Motion, are part of its scheme to totally deprive Smartmatic the opportunity to participate in the 2025 AES procurement.

19. *Third.* Even assuming *arguendo* that the reason offered by the OSG for not being able to comply with the period given by this Honorable Court may be considered as "good and sufficient", the inconvenience to the OSG and the COMELEC cannot outweigh the prejudice that Smartmatic will suffer if its prayer for the issuance of an injunctive writ cannot be resolved prior to the bidding scheduled on 8 January 2024.

20. Smartmatic's right to due process has already been violated by the whimsical and capricious exercise of judgment by the COMELEC in issuing the Assailed Resolution and expanding the same to disqualify all entities related to Smartmatic in the 2025 AES procurement. As discussed in the Petition and the Manifestation and Supplement, Smartmatic and its related entities will suffer grave and irreparable injury if the wholesale implementation and execution of the Assailed Resolution is not prevented.

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<sup>16</sup> Emphasis and underscoring supplied.

21. By delaying these proceedings, the COMELEC is able to create for itself a situation where it can continue to breathe life to the void Assailed Resolution and proceed with the submission of bids on 8 January 2024 while unprocedurally, arbitrarily and capriciously excluding qualified parties, particularly Smartmatic, with impunity.

22. It bears stressing that ensuring that public bidding processes are fair and open to all is essential to promote transparency, competition, and equal opportunity. A competitive public bidding seeks to safeguard public interest by maximizing advantages through open competition. This mechanism allows government agencies to prevent or address anomalies in public contract execution. The strict adherence to bidding process rules, regulations, and guidelines serves as the primary safeguard, ensuring a fair, honest, and competitive public bidding environment.<sup>17</sup> However, the COMELEC seems adamant in renegeing on this mandate to the prejudice of Petitioners and the public, even at the risk of having the entire procurement proceedings nullified.

23. Further to this point, on 28 December 2023, Petitioners already received the *Comment (To the Petition dated 06 December 2023) with Opposition to the Issuance of a Temporary Restraining Order and/or Writ of Preliminary Injunction* of even date filed by Private Respondents Eliseo Mijares Rio, Jr., Augusto Cadeliña Lagman, and Franklin Fayloga Ysaac (collectively, "Private Respondents"). Under Section 5, Rule 65 of the Rules of Court, when the petition for certiorari relates to an act of a public respondent, it shall be the duty of the private respondents to appear and defend, both in his or their own behalf and on behalf of the public respondent, except when otherwise directed by the court:<sup>18</sup>

"Section 5. Respondents and costs in certain cases. — When the petition filed relates to the acts or omissions of a judge, court, quasi-judicial agency, tribunal, corporation, board, officer or person, the petitioner shall join, as private respondent or respondents with such public respondent or respondents, the person or persons interested in sustaining the proceedings in the court; and **it shall be the duty of such private respondents to appear and defend, both in his or their own behalf and in behalf of the public respondent or respondents affected by the proceedings,** and the costs awarded in such proceedings in favor of the petitioner shall be against the private respondents only,

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<sup>17</sup> Felicitas v. Yunting, G.R. No. 232252 (Notice), 8 March 2023.

<sup>18</sup> RULES OF COURT, Rule 65, Sec. 5.



and not against the judge, court, quasi-judicial agency, tribunal, corporation, board, officer or person impleaded as public respondent or respondents.

Unless otherwise specifically directed by the court where the petition is pending, the public respondents shall not appear in or file an answer or comment to the petition or any pleading therein. If the case is elevated to a higher court by either party, the public respondents shall be included therein as nominal parties. However, unless otherwise specifically directed by the court, they shall not appear or participate in the proceedings therein.”

24. The COMELEC, as Public Respondent, may therefore adopt the Comment filed by the Private Respondents for the purpose of this proceeding. Clearly, the COMELEC will not be prejudiced by the denial of the present Omnibus Motion, whereas Smartmatic will undeniably be prejudiced should the same be granted.

25. In fine, the extreme urgency of the issues at hand and the resolution thereof cannot be overemphasized and is apparent from all of Smartmatic’s submissions before this Honorable Court. In fact, even this Honorable Court acknowledged such urgency considering that it ordered the Respondents to file a comment on the Petition within a non-extendible period of 10 days from notice of the Order, and further ensured that the Respondents would already have a copy of both the Petition and the Order.

26. Despite this urgency, the present Omnibus Motion is being filed to delay the proceedings before this Honorable Court and prevent Smartmatic from participating in the submission of bids scheduled on 8 January 2024. Thus, in the interest of justice, the COMELEC’s orchestrated acts of fully depriving Smartmatic of the opportunity to participate in the 2025 AES procurement should not be permitted and its Omnibus Motion should perforce be denied.

#### **PRAYER**

**WHEREFORE,** Petitioners **SMARTMATIC** **TIM CORPORATION** and **SMARTMATIC PHILIPPINES, INC.,** respectfully pray that this Honorable Court:

1. **DENY** the Omnibus Motion dated 28 December 2023.

2. **CONSIDER** the *Petition for Certiorari (with Extremely Urgent Application for the Issuance of a Temporary Restraining Order and/or Writ of Preliminary Injunction) with Urgent Motion for Special Raffle* dated 6 December 2023 as submitted for Resolution.

Smartmatic likewise prays for such further or other relief as may be deemed just or equitable.

Taguig City for Manila, 29 December 2023.

**ANGARA ABELLO CONCEPCION REGALA & CRUZ**

*Counsel for Petitioners Smartmatic TIM Corporation and  
Smartmatic Philippines Inc.*

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By:

**GEORGE S.D. AQUINO**

PTR No. A-5801917; 01/11/2023; Taguig City  
IBP No. 181495; 01/06/2023; Makati City  
Roll No. 43840  
MCLE Compliance No. VII-0007698; 10/02/21  
[gsaquino@accralaw.com](mailto:gsaquino@accralaw.com)




**LEO FREDERICK Z. CRUZ**

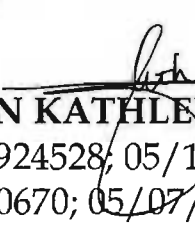
PTR No. 0162304; 01/05/2023; Pasig City;  
IBP No. 272364; 01/05/2023; Manila City IV;  
Roll No. 69737  
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**MIGUEL RICO E. DE GUZMAN**

PTR No. A-57976214; 01/11/2023; Taguig City  
IBP No. 249214; 01/06/2023; Makati City  
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4

  
**GINO ISMAEL S. GERODIAS**  
PTR No. A-5797295; 01/11/2023; Taguig City  
IBP No. 249226; 01/06/2023; Quezon City  
Roll No. 77945  
MCLE Compliance No. NA; (Admitted on May 2022)  
[gsgerodias@accralaw.com](mailto:gsgerodias@accralaw.com)

  
**GE-AN KATHLEENA SALUD**  
PTR No. A-5924528; 05/16/2023; Taguig City  
IBP No. 340670; 05/07/2023; Makati City  
Roll No. 87310  
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*Copy furnished:*

**COMMISSION ON ELECTIONS**  
*Public Respondent*  
Palacio del Gobernador Building,  
General Luna Street, Intramuros,  
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R. R. No.: RE 854 957 984 22  
Date: 29 DEC 2023

**LEONARDO OLIVERA ODOÑO**  
*Private Respondent*  
19871 Willow Street,  
Executive Heights, Bgy. Sun Valley,  
Paranaque City

R. R. No.: RE 854 957 975 22  
Date: 29 DEC 2023

**ATTY. JOSE M. JOSE**  
*Counsel for the Private Respondents*  
60 Rivera Street, Barangay Progreso,  
San Juan City,  
[jmjose64@yahoo.com](mailto:jmjose64@yahoo.com)

R. R. No.: RE 854 957 967 22  
Date: 29 DEC 2023

**OFFICE OF THE SOLICITOR GENERAL**  
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R. R. No.: RE 854 957 953 22  
Date: 29 DEC 2023

## EXPLANATION

Undersigned counsel respectfully manifests that the foregoing **OPPOSITION** will be served by registered mail because of time and distance constraints, as well as the limited number of office messengers, render personal service impracticable.



**GINO ISMAEL S. GERODIAS**

# OFFICE COPY

REPUBLIC OF THE PHILIPPINES)  
TAGUIG CITY )S.S.

## AFFIDAVIT OF SERVICE

I, **ARNEL E. DIAMANTE**, as Messenger Clerk of **ANGARA ABELLO CONCEPCION REGALA & CRUZ LAW OFFICES** with office address at the 22/F ACCRALAW Tower, 2nd Avenue corner 30th St., Crescent Part West, Bonifacio Global City, 1635 Taguig, Metro Manila, after being duly sworn, depose and say:

That on 29 December 2023, I served a copies of the **OPPOSITION (TO: OMNIBUS MOTION (i) FOR THE RECONSIDERATION OF THE HONORABLE COURT'S ORDER DATED 18 DECEMBER 2023; AND (II) FOR AN ADDITIONAL PERIOD TO FILE COMMENT DATED 28 DECEMBER 2023)** in the case entitled "SMARTMATIC TIM CORPORATION, AND SMARTMATIC PHILIPPINES, INC. VS. COMMISSION ON ELECTIONS EN BANC, ELISEO MIJARES RIO JR, AUGUSTO CADELIÑA LAGMAN, FRANKLIN FAYLOGA YSAAC AND LEONARDO OLIVERO ODOÑO," docketed as G.R. No. 270564 in the Supreme Court, *En Banc*, Manila, pursuant to Sections 5, 6, 7, 11 and 13, Rule 13 of the Rules of Court as follows:

### Registered Mail:

#### COMMISSION ON ELECTIONS

*Public Respondent*

Palacio del Gobernador Building,  
General Luna Street, Intramuros,  
Manila 1002

DE 854 957 984 22  
LEONARDO OLIVERA ODOÑO

*Private Respondent*

19871 Willow Street,  
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ATTY. JOSE M. JOSE

*Counsel for the Private Respondents*

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San Juan City,

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OFFICE OF THE SOLICITOR GENERAL

134 Amorsolo Street, Legaspi Village  
1229 Makati City

[docket@osg.gov.ph](mailto:docket@osg.gov.ph)

DE 854 957 953 22

by depositing a copy thereof on 29 December 2023 at the post office of Manila in a sealed envelopes plainly addressed to them, with postage fully prepaid, as evidenced by Registry Receipt Nos. \_\_\_\_\_ attached hereto after the name of the addressees, and with instructions to the postmaster to return the mail to the sender after ten (10) days if undelivered.

  
**ARNEL E. DIAMANTE**  
*Affiant*

**SUBSCRIBED AND SWORN** to before me this 29<sup>th</sup> day of December 2023, at Taguig City Philippines, affiant who is personally known to me, exhibiting to me the following:

Affiant	Competent Evidence of Identity	
	Type of ID	ID Number and Expiry Date (if applicable)
ARNEL E. DIAMANTE	Driver's License ID	N01-10-016082 Exp. 2024/09/25
	Pag-Ibig Loyalty Card Plus	1210-3299-3779

Doc. No. 1371  
 Page No. 243  
 Book No. 1371  
 Series of 2023



5.10022 (SMMIT) Reg-Arirel (29 Dec. 2023)

  
**ATTY. JASON DON S. DIZON**  
 Notary Public for Taguig City  
 Until December 31, 2024  
 PTR No. A-5916105; May 08, 2023 – Taguig City  
 IBP No. 333637; May 03, 2023 – Makati City  
 Appointment / Commission No. 167 (2023-2024)  
 Roll No. 85475  
**Angara Abello Concepcion Regala & Cruz Law Offices**  
 22/F ACCRALAW Tower  
 2nd Avenue corner 30th St., Crescent Park West,  
 Bonifacio Global City, 1635 Taguig, Metro Manila  
 MCLE Compliance No. N/A; (Admitted on May 2023)