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REPUBLIC OF THE PHILIPPINES
Supreme Court
MANILA

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PASTOR APOLLO CARREON QUIBOLOY,
Petitioner,

272420

-versus-

G.R. No. _____

**FOR: CERTIORARI
AND PROHIBITION
UNDER RULE 65,
WITH PRAYER FOR
ISSUANCE OF
TEMPORARY
RESTRAINING
ORDER and/or
PRELIMINARY
INJUNCTION**

The Senate of the Philippines, The Senate Committee on Women, Children, Family Relations & Gender Equality, Hon. Senator Risa N. Hontiveros, in her capacity as the Chairperson of the Committee on Women, Children, Family Relations & Gender Equality, Hon. Senator Juan Miguel F. Zubiri in his official capacity as Senate President of the Philippines, [Ret.] MGEN. Rene C. Samonte, in his capacity as the Senate Sergeant-At-Arms.

Respondents.

X-----X

URGENT MOTION FOR SPECIAL RAFFLE

Petitioner **PASTOR APOLLO CARREON QUIBOLOY**, thru counsel, hereby states:

1. Petitioner filed the present Petition for Certiorari and Prohibition (With Application for Issuance of a Temporary Restraining Order and/or Writ of Preliminary Injunction) on March 22, 2024, praying, among others, for the Honorable Court to enjoin all respondents, their agents, representatives, employees and subordinates from:

- a. enforcing the Subpoenas Ad Testificandum dated February 14 and 20, 2024;

- b. enforcing the Order Contempt dated March 5, 2024;
- c. enforcing the Ruling of the Senate dated March 18, 2024;
- d. enforcing the Arrest and Detention Order dated March 19, 2024; and
- e. demanding the attendance of petitioner at any and all public hearings in connection with Senate Resolution No. 884.

2. As explained extensively in the Petition, respondents, while making it appear that their actions pursuant to Senate Resolution No. 884 are intended for the purpose of making an inquiry in aid of legislation, are, in reality, compelling the attendance of petitioner at the public hearings for the purpose of prosecuting, persecuting and making a public mockery of the latter. This is clear in the proceedings which have transpired thus far in connection with Senate Resolution No. 884.

3. Despite petitioner's clear and valid legal grounds for his failure to appear before the respondents, one of which is his right against self-incrimination, respondents not only cited him in contempt but also issued an order for petitioner's arrest and detention.

4. All said incidents occurred in a span of less than one (1) month.

5. Presently, both petitioner's right against self-incrimination and right to liberty is in grave danger of violation by the respondents.

6. Due to the prevailing circumstances, the basic and fundamental human rights involved in this case, and in view of the extreme urgency of the reliefs prayed for, petitioner respectfully requests that the Petition be specially raffled at the earliest so that the Honorable Supreme Court may be able to consider petitioner's application for the issuance of a temporary restraining order and/or writ of preliminary injunction at the soonest time possible.

PRAYER

WHEREFORE, petitioner **PASTOR APOLLO CARREON QUIBOLOY** respectfully prays that the Honorable Supreme Court order the conduct of a special raffle of the above-captioned case so that the merits of the same, especially the prayer for the temporary restraining order and/or writ of preliminary injunction, can be heard at the earliest possible opportunity.

Petitioner prays for such other reliefs just and equitable under the premises.

Pasig City for Manila. March 22, 2024.


PETER JOEY B. USITA

Counsel for the Petitioner

Roll of Attorneys No. 38572

PTR No. 0297402/01-31-2024/Pasig City

IBP No. 307159/01-31-2024/QC

MCLE Exemption No. VII Acad003688

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1605 Pasig City
Email: atty.usita@gmail.com

Copy furnished:

Sen. Risa N. Hontiveros
Sen. Pres. Juan Miguel F. Zubiri
MGen. Montesa
Senate of the Philippines
Roxas Boulevard, Pasay City

**OFFICE OF THE SOLICITOR
GENERAL**

134 Amorsolo St., Legaspi Village,
Makati City

EXPLANATION

Due to lack of available office/messengerial personnel, services of the Urgent Motion for Special Raffle to the other parties by registered mails were resorted to.


PETER JOEY B. USITA

Counsel

REPUBLIC OF THE PHILIPPINES)
PASIG CITY) SS.

AFFIDAVIT OF FILING AND SERVICE

I, **JIM A. GUILLERMO**, an employee of **PETER JOEY B. USITA**, with office address at the 12B Marco Polo, Sapphire Road, Ortigas Center, 1605 Pasig City, after being duly sworn, depose and say:

On 22 March 2024, I personally filed the following:

URGENT MOTION FOR SPECIAL RAFFLE

in G.R. No. _____ entitled "*Pastor Apollo Carreon Quiboloy v. The Senate of the Philippines; et al.*," with:

THE HONORABLE SUPREME COURT
Manila

and served copies thereof by registered mail to the following:

Sen. Risa N. Hontiveros
Sen. Pres. Juan Miguel F. Zubiri
MGen. Montesa
Senate of the Philippines
Roxas Boulevard, Pasay City

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

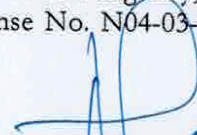
by depositing copies thereof on 22 March 2024 at the Ortigas Center Post Office as evidenced by Registry Receipt Nos. RM 869 410 891 72 and RM 869 415 891 72, attached hereto, and with instructions to the postmaster to return the mail to the sender after ten (10) days if undelivered pursuant to Sections 3, 4, 5, 10, 11, and 13, Rule 13 of the 1997 Rules of Civil Procedure.

Pasig City, 22 March 2024.


JIM A. GUILLERMO
Affiant

SUBSCRIBED AND SWORN to before me on this 22 March 2024 in Pasig City, affiant exhibiting to me his competent evidence in the form of his Driver's License No. N04-03-006286 expiring on 08 April 2033.

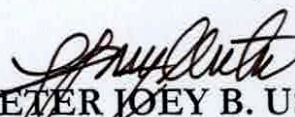
Doc. No. 48;
Page No. 9;
Book No. 1;
Series of 2024.


ATTY. ARMANDO M. ASTROLOGO JR.
Notary Public
Appointment No. 108 (2024-2025)
Valid until Dec. 31, 2025
Roll No. 82757
IBP No. 414210/414211, January 10, 2024
PTR No. 1882360, February 05, 2024
MCLE Compliance
Atty. Armando M. Astrologo Jr.
Unit 505 OMM-CITRA Building
Ortigas Business Center, Pasig City

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

VERIFIED DECLARATION

I, **PETER JOEY B. USITA**, hereby declare that the Petition and annexes hereto submitted electronically in accordance with the Efficient Use of Paper Rule is a complete and true copy of the document and annexes personally filed with the Supreme Court.


PETER JOEY B. USITA
Counsel for Pastor Apollo Carreon Quiboloy
March 22, 2024

SUBSCRIBED AND SWORN to before me this March 22, 2024 in Pasig City, affiant exhibiting to me his competent evidence of identity in the form of Driver's License No. N03-93-144014 expiring on 01 December 2031.


ATTY. ARMANDO M. ASTROLOGO JR.

Notary Public
Appointment No. 100/2024-2025)
Valid until Dec. 31, 2025
Roll No. 82757
IBP No. 414210/414211, January 10, 2024
PTR No. 1882360, February 05, 2024
MCLE Compliance
Admitted May 31, 2021
Unit 505 OMM-CITRA Building
Ortigas Business Center, Pasig City

Doc. No. 49;
Page No. 9;
Book No. 1;
Series of 2024.

