

Ms. Bing
Ms. Cecille

For your info & appropriate
action, pls.

Myline

9/1/2020



REPUBLIC OF THE PHILIPPINES
DEPARTMENT OF JUSTICE
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12 August 2020

Atty. AL CONRAD ESPALDON
OIC-Legal Department
**TOURISM INFRASTRUCTURE AND
ENTERPRISE ZONE AUTHORITY**
6th & 7th Floors, Tower 1 Double Dragon Plaza
Macapagal Avenue cor. EDSA Extension
1302, Bay Area, Pasay City

Re: Ejectment of Baguio-Benguet Chamber of Commerce

Dear Atty. Espaldon:

Please be informed that we are in the process of preparing Tourism Infrastructure and Enterprise Zone Authority's (TIEZA) Complaint for Ejectment against its tenant, Baguio-Benguet Chamber of Commerce, Inc. (BBCCI), which should be compliant with the new Rules of Civil Procedure.

Under the new Rules of Civil Procedure, every pleading must contain the following, to wit:

Section 6. *Contents.* — Every pleading stating a party's claims or defenses shall, in addition to those mandated by Section 2, Rule 7, state the following:

- (a) Names of witnesses who will be presented to prove a party's claim or defense;
- (b) Summary of the witnesses' intended testimonies, provided that the judicial affidavits of said witnesses shall be attached to the pleading and form an integral part thereof. Only witnesses whose judicial affidavits are attached to the pleading shall be presented by the parties during trial.

..... committed to uphold justice
under the rule of law

recd 8/25
thru whatsapp

- ① LEGAL
- ② Cecille Saeloro
- ③ COA
- ④ DOT Reg CAR
- ⑤ J. F. Linares



Except if a party presents meritorious reasons as basis for the admission of additional witnesses, no other witness or affidavit shall be heard or admitted by the court; and

- (c) Documentary and object evidence in support of the allegations contained in the pleading.

For this purpose, we respectfully request for a list of persons who have personal knowledge of the factual issues involved in BBCCT's lease, as well as the summary of the matters that they are competent to testify on. Thereafter, we shall schedule a meeting with each one of them in order to ascertain the facts of their own personal knowledge, to incorporate such facts in the Complaint, and to prepare their respective Judicial Affidavits. You may send us the list of witnesses with summary of their respective testimonies to the following email address: wanrj.ogcc@yahoo.com.

We look forward to hearing from you soon.

Very truly yours,


ELPIDIO J. VEGA
Government Corporate Counsel

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under the rule of law