

REPUBLIC OF THE PHILIPPINES)

Province Of \_\_\_\_\_) S.S.

City/Municipality Of \_\_\_\_\_

x-----x

COMPLAINT AFFIDAVIT

I, Frederick Lupito, of legal age, single, Filipino citizen and a resident of 185-C Maganda Street, Sta. Mesa, Manila after having been duly sworn according to law hereby depose and say:

- 1. That I am instituting this complaint against Kristian Buenaventura who is of legal age, Filipino citizen and a resident of 197 Maganda Street Sta. Mesa Manila.
- 2. That on February 20, 2014, at about 4:00 a.m. Mr. Buenaventura was driving along the neighbourhood in his Toyota Altis while drunk as evidenced by testimonies of witnesses on the incident attached hereto as ANNEX ‘A’ and ANNEX ‘B’.
- 3. Without any extraordinary circumstance that would warrant an accident, his car bumped the gate of my house, rendering the same to be beyond repair as evidenced by a CCTV footage attached hereto as ANNEX ‘C’.
- 4. That in view of the foregoing facts, I am instituting this complaint as the owner of the aforesaid property.

RELIEF

WHEREFORE, premises considered, it is most respectfully prayed unto this Honorable Court that, after hearing, judgment be rendered ordering the defendant:

- 1. To pay actual damages in the amount of fifty thousand pesos representing the cost of the property damaged.
- 2. To pay the plaintiff the cost of the suit;
- 3. Such other relief as the court may deem proper.

City of Manila, February 20, 2014.

FADERUGAO-FORTALEZA LAW OFFICE

Counsel for the Plaintiff

Unit 123, Victoria Tower I

Taft Avenue, Manila

By:

\_\_\_\_\_

Roll of Attorney No. \_\_\_\_\_

IBP No. \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

PTR No. \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

CERTIFICATION OF NON-FORUM SHOPPING

Republic of the Philippines)

Province of \_\_\_\_\_) S.S.

City/Municipality of \_\_\_\_\_)

x ----- x

I, \_\_\_\_\_, of legal age, Filipino, (single / married / widow), and a resident of \_\_\_\_\_, Philippines, after being sworn in accordance with law, hereby depose and certify that:

- 1. I have not theretofore commenced any other action or proceeding or filed any claim involving the same issues or matter in any court, tribunal, or quasi-judicial agency and, to the best of my knowledge, no such action or proceeding is pending therein; (c) if I should thereafter learn that the same or similar action or proceeding has been filed or is pending before the Supreme Court, the Court of Appeals, or any other tribunal or quasi-judicial agency, I undertake to report such fact within five (5) days therefrom to the court or agency wherein the original pleading and sworn certification contemplated herein have been filed.

IN WITNESS WHEREOF, I have hereunto set my hand this \_\_\_\_\_ at \_\_\_\_\_, Philippines.

\_\_\_\_\_

AFFIANT

SUBSCRIBED AND SWORN to before me, this \_\_\_\_\_, by \_\_\_\_\_ who exhibited to me (his/her) Community Tax Certificate No. \_\_\_\_\_ issued at \_\_\_\_\_, Philippines on \_\_\_\_\_.

Notary Public

Doc. No. \_\_\_\_\_;

Page No. \_\_\_\_\_;

Book No. \_\_\_\_\_;

Series of 20\_\_;