

JUDICIAL AFFIDAVIT OF ZHAYCA ESTRELLER

The judicial affidavit of the witness is being recorded in Makati City, with Atty. Kimberly Anne M. Lorenzo conducting the examination of the witness. The witness has been advised to answer truthfully the questions being asked of her, and has been made aware that her testimony is under oath and that she may be criminally liable for perjury or false testimony on account of the answers that she will give. The direct examination of the witness was made in Filipino, in which language the witness is comfortable expressing herself. The English translation of the questions and answers are provided.

COUNSEL: Your Honor, we formally offer the testimony of Zhayca Z. Canda for the purpose of proving the following:

1. She is the common law wife of Jerry Estreller, Jr., who was shot dead by unidentified men at around midnight of December 15, 2016;
2. The circumstances surrounding the death of her partner by the said unidentified men;
3. The circumstances surrounding her arrest and detention together with her two sons, Naithan and Nigel, age 7 and 8 respectively, by the police at Manila Police District (MPD) Station 6 in Sta. Ana, Manila, after her partner was gunned down;
4. Other matters relevant and material to her direct testimony;
5. To support all the other allegations in the Petition for the Issuance of the Writ of Amparo.

COUNSEL: Your Honor, we pray that this Judicial Affidavit be taken as the direct testimony of the witness.

Q1. Ms. Witness, maari mo po bang ilahad ang iyong pangalan, tirahan, kasalukuyang trabaho, at iba pang personal na pagkakakilanlan?

(Q1. Ms. Witness, may you please state your name, address, present employment, and other personal circumstances?)

- A1.** Ako po si ZHAYCA ESTRELLER, 23 years old, may pamilya, residente ng 1661 Estrada Street, San Andres Bukid, Manila, at kasalukuyang namamasukan bilang kasambahay.

(A1. I am ZHAYCA ESTRELLER, 23 years old, with a family, a resident of 1661 Estrada Street, San Andres Bukid, Manila and currently working as a house helper.)

- Q2.** Nabanggit po ninyo na kayo ay may pamilya. Sino-sino ang miyembro ng iyong pamilya?

(Q2. You mentioned that you have a family. What are the names of the members of your family?)

- A2.** Ang kinakasama ko po na si Jerry Estreller, Jr., mas kilala dito sa amin na si JR, pero nakasanayan po namin siyang tawagin na GG. Ang mga anak ko po na sina Naithan at Nigel, edad 8 at 7.

(A2. My partner is Jerry Estreller, Jr., also known as JR, but we got used to calling him GG. My sons Naithan at Nigel, age 8 and 7 respectively.)

- Q3.** Maaari ninyo po bang ilahad kung nasaan kayo noong hatinggabi ng Disyembre 15, 2016?

(Q3. Can you tell us where you were around midnight of December 15, 2016?)

- A3.** Nasa bahay po ako noong mga panahon na iyon, sa 1661 Estrada Street, San Andres Bukid, Manila.

(A3. I was at home at that time, at 1661 Estrada Street, San Andres Bukid, Manila.)

- Q4.** Ano ang ginagawa mo noon?

(Q4. What were you doing at that time?)

A4. Mga alas-dose po ng hating-gabi, patulog na po kami noon.

(A4. At almost midnight, we were about to go to sleep.)

Q5. Sinong kasama mo, kung mayroon man?

(Q5. Who were with you, if any?)

A5. Kasama ko po noon si GG at mga anak ko, yung dalawa, si Naithan at Nigel. Kakatapos lang namin patayin yung telebisyon. Sinabihan ako ni GG na isarado na ang pinto. Pinalock niya ito.

(A5. I was with GG, and my children, the two of them, Nathan and Nigel. I just turned off the television. GG told me to close the door. He asked me to lock it.)

Q6. May iba pa ba kayong kasama sa bahay noong panahon na iyon?

(Q6. Were there other people in the house at that time?)

A6. Opo. Nandoon din si Kuya Aga. Doon siya natutulog sa taas.

(A6. Yes. Kuya Aga was also there. He was sleeping at the second floor.)

Q7. Ms. Witness, sino itong tinutukoy mo na si Aga?

(Q7. Ms. Witness, who is this Aga you are referring to?)

A7. Siya po si Randy Concordia, mas kilala bilang Aga. Isa po siyang malapit na kaibigan.

(A7. He is Randy Concoria, more familiarly known as Aga. He is a close family friend.)

Q8. Ms. Witness, bakit sa bahay ninyo natutulog si Aga noong gabing iyon?

(Q8. Ms. Witness, why was Aga sleeping in your house that night?)

A8. Bumibisita lang po siya noong mga panahon na iyon kaya pinatulog namin siya sa taas.

(A8. He was just visiting at that time so we let him sleep at the second floor of the house.)

Q9. Paano mo nalaman na natutulog na siya ng mga oras na iyon?

(Q9. How did you know that he was already asleep at that time?)

A9. Sa pagkakaalam ko po, natutulog na si Kuya Aga kasi patay na po yung telebisyon sa taas.

(A9. As far as I know, he was already sleeping at that time because the television at the second floor was already turned off.)

Q10. Nabanggit mo na pinatay mo na rin ang telebisyon sa first floor. Ano na ang ginawa mo pagkatapos, kung mayroon man?

(Q10. You mentioned that you also turned off the television at the first floor. What did you do next, if any?)

A10. Matutulog na po sana kami, pero po maya-maya, napansin namin na ang daming langgam na naglalaglagan sa higaan namin galing sa kisame. Ang daming kagat ng bunso kong si Nigel. Ang ginawa po ni GG, kumuha ng papel tapos sinindihan at sinunog 'yung mga langgam.

(A10. We were about to sleep when we noticed that there were many ants crawling on our bed falling from the ceiling. My son Nigel had a lot of bites from the ants. What GG did was he got a piece of paper and lit it. Then, he used it to burn and drive away the ants.)

Q11. Anong nangyari pagkatapos, kung mayroon man?

(Q11. What happened after, if any?)

A11. Pagkatapos hipan at patayin ni GG yung apoy, nagulat kami nang may kumakalabog sa pinto

(A11. After GG put out and blew out the flames, we were startled by someone banging on the door.)

Q12. Anong sumunod na nangyari, kung mayroon man, pagkatapos niyong marinig na may kumakalabog sa pinto ?

(Q12. What happened next, if any, after you heard that someone was banging on the door ?)

A12. Nagimbal kami dahil may tumadyak pabukas ng pinto, kaya nasira ito. Tapos pumasok yung mga armadong tao.

(A12. We were shocked when someone kicked the door open, destroying it. Then armed men streamed in.)

Q13. Sino ang mga armadong kalalaking ito?

(Q13. Who were these armed men?)

A13. Mga pulis po sila.

(A13. They were police officers.)

Q14. Ano ang ginawa ninyo nang makita sila?

(Q14. What did you do when you saw them?)

A14. Sa takot namin, niyakap namin ang isa't isa, pati ang mga maliliit na anak namin.

(A14. Terrified, we all held each other in a tight embrace, including our two young sons.)

Q15. Ilang taon na po ang mga anak ninyo?

(Q15. How old are your children?)

A15. Si Naithan po walong (8) taon, samantalang si Nigel po 7 pa lang.

(A15. Nathan is 8 years old, while Nigel is only 7.)

Q16. Ms. Witness, nabanggit mo ang mga armadong lalaki na tumadyak sa pintuan papasok sa bahay ninyo ay mg pulis. Paano mo nalaman na mga pulis sila?

(Q16. Ms. Witness, you mentioned that the armed men who kicked their way into your house were policemen. How did you know that they were policemen?)

A16. Nalaman ko na mga pulis sila dahil nagpakita sila ng tsapa. Sinabi noong isa, "Pulis 'to, huwag kayong kikiilos."

(A16. I knew that they were policemen because one brandished his police badge while exclaiming "This is the police, do not move.")

Q17. Ano ang sinabi nilang dahilan kung bakit nandoon sila?

(Q17. What reason did they give for being there?)

A17. Wala po. Hindi rin po nila sinabi kung ano ang pakay nila.

(A17. None. They did not tell us their purpose.)

Q18. Bukod sa pinakita nilang tsapa, ano, kung meron man, ang ibang ipinakita nila sa inyong legal na basehan sa kanilang gagawin sa inyong tahanan?

(Q18. Aside from showing the police badge, what did they present to you, if any, as legal basis for what they were going to do in your home?)

A18. Wala po, yung tsapa lang po nila. Wala silang pinakitang search warrant o warrant of arrest o kahit anumang dokumento sa pag-aresto.

(A18. None, only their police badge. They did not show any search warrant or warrant of arrest, or any document authorizing arrest.)

Q19. Itong mga pulis na pumasok sa bahay ninyo, mga ilan sila?

(Q19. These policemen who entered your house, how many were they?)

A19. Mga limang lalaki po silang pumasok sa bahay. Umakyat din sila sa taas, ang lalaki ng katawan.

(A19. Around five men entered our house. They also went to the second floor. They were heavily built.)

Q20. Ano ang mga suot nila?

(Q20. What were they wearing?)

A20. Yung iba naka-shorts lang, nakasibilyan. May mga hawak din silang baril.

(A20. Some of them were wearing shorts. They were wearing civilian clothes. They were also carrying guns.)

Q21. Maari mo bang ilarawan ang mga baril nila?

(Q21. Can you describe their guns?)

A21. Iba-iba po. May mahabang baril tapos meron din pong maikli. Iyong nakatutok po kay GG mahaba po iyon kaya hindi na siya nakakilos .

(A21. They are of different sizes. There are long guns and there are also short guns. The one pointed at GG was a long firearm so he was not able to move.)

Q22. Anong ginawa ni GG noong tinutukan siya ng mahabang baril?

(Q22. What did CG do when a long firearm was pointed at him?)

A22. Pinayuko lang po siya. Nakahawak po siya sa akin. Sinabi po niya sa mga pulis na wala po kaming ginagawang masama.

(A22. He was ordered to bow his head. He was holding onto me. He pleaded with the police that we were not doing anything wrong.)

Q23. Anong ginawa mo noon, kung meron man?

(Q23. What did you do then, if any?)

A23. Nagmakaawa rin po ako. Sabi ko "SIR, WALA KAMING GINAGAWANG MASAMA, WALA KAMING KASALANAN."

(A23. I also pleaded to them. I told them, "Sir, we are not doing anything wrong, we are free of any fault.")

Q24. Anong ginawa ng mga pulis, kung meron man?

(Q24. What did the police do, if any?)

A24. Ayaw na kaming pagsalitain ng mga pulis, ng kaming mag-asawa ay patuloy na nagpapaliwanag. Sabi ng mga pulis, "Tama na.. Tama na. Ang ingay! Huwag na kayong maingay."

(A24. The police would not allow us to talk anymore, when my partner and I continued to explain. The police told us, "Stop it.. Stop it. You're loud! Don't make any noise.")

Q25. Anong nangyari pagkatapos nito, kung meron man?

(Q25. What happened after, if any?)

A25. Pagkatapos po nito, pilit po kami nilang pinalabas ng bahay.

(A25. After this, they forced us to get out of our house.)

Q26. Sinu-sino ang pilit nilang pinalabas ng bahay?

(Q26. Whom were they forcing to get out of the house?)

A26. Kami po ng mga anak ko. Pilit po nila kaming pinalalabas ng bahay.

(A26. I and my sons. They were forcing us out of the house.)

Q27. Paano kayo nilang pilit pinalalabas ng bahay?

(Q27. How were they forcing you to leave the house?)

A27. Hinihila po nila ako at ang mga anak ko. Magkakayakap po kaming buong pamilya ng ganito, pero hinila po nila ako at yung mga anak ko palabas ng bahay, palayo po kay GG na naiwan sa loob.

(A27. They were dragging my children and me. Our whole family was locked in an embrace like this, but they pulled us away from GG who was left inside.)

COUNSEL: Your Honor, Witness is crying while narrating and reenacting the manner how they were pulled apart.

Q28. Ano ang ginawa ninyo, kung meron man?

(Q28. What did you do, if any?)

A28. Sinabihan ko si GG, 'G, tulong!'

(A28. I told GG, 'G, help!')

Q29. Ano ang ginawa ni GG, kung meron man?

(Q29. What did GG do, if any?)

A29. Umiiyak po sa akin si GG. Sinabihan na lang niya ko na 'Sige, lumabas ka na lang kasi baka madamay ka pa.'

(A29. GG was crying onto me. He just told me to go because I might also suffer what is going to happen to him.)

Q30. Ano ang iyong naramdaman nang mga panahon na iyon?

(Q30. What did you feel while this was happening?)

A30. Takot na takot po ako noon. Sumisigaw ako ng tulong. Habang kinakaladkad po ako, sabi ko, "GG, tulong!" Pero hindi rin niya ako matulungan kasi nakatutok sa amin yung mga baril.

(A30. I was terrified. I was shouting for help. While they were dragging me out, I was crying, "CG, help!" But he could not help me because the guns were pointed at us.)

Q31. At nasaan naman ang inyong dalawang anak noong puntong iyon?

(Q31. At that point, where were your two children?)

A31. Kasama ko sila.

(A31. They were there, with me.)

Q32. Anong ginagawa nila, kung meron man?

(Q32. What were they doing, if any?)

A32. Nagsisi-iyakan din po sila kasi natatakot sila. Bigla din po kasi silang nagising noong nangyari ang mga ito. Biglang sinipa yung pintuan kaya nagulat sila.

(A32. They were also crying because they were afraid. They were roused from sleep by what happened. The door was kicked open so they were stunned.)

Q33. Ano ang mga sumunod na nangyari, kung meron man?

(Q33. What happened next, if any?)

A33. Pilit nga po kami pinalalabas. Karga-karga ko yung mga anak ko habang hinihila kami palabas kaya't wala na kaming naisuot pang tsinelas.

(A33. They were forcing us to leave the house. I was carrying my children while they were pulling at us so we were not able to wear any slippers.)

Q34. Noong kinakaladkad kayo palabas, ano ang napansin mong nangyayari sa loob ng bahay, kung meron man?

(Q34. While you were being dragged outside of the house, what did you notice was happening inside the house, if any?)

A34. Umakyat ang mga lalaki kung nasaan si Kuya Aga.

(A34. The men went up to where Kuya Aga is staying.)

Q35. Ano ang sumunod na nangyari, kung meron man?

(Q35. What happened next, if any?)

A35. Dinala po kami sa police station.

(A35. We were brought to the police station.)

Q36. Sino ang kasama mo noong dinala ka sa police station?

(Q36. Who were with you when you were brought to the police station?)

A36. Yung dalawang anak ko, si Naithan at Nigel.

(A36. My two sons, Naithan and Nigel.)

Q37. Saang police station kayo dinala?

(Q37. To which police station did they bring you?)

A37. Sa Manila Police District Station 6 sa Sta. Ana, Manila.

(A37. In Manila Police District Station 6 in Sta. Ana, Manila..)

Q38. Paano kayo dinala sa Police Station 6?

(Q38. How were you brought to Police Station 6?)

A38. May nakaabang po na kotse sa kalsada tapos isinakay po nila kami.

(A38. There was a car waiting in the street onto which were loaded.)

Q39. Maaari mo bang ilarawan ang kotse na iyon?

(Q39. Can you describe the car?)

A39. Yung kotse po, pulis mobil po iyon.

(A39. The car was a police mobile patrol car.)

Q40. Sinu-sino ang nagpasakay sa inyo?

(Q40. Who made you ride the car?)

A40. Yung isa po sa mga lalaki na pumasok sa bahay namin.

(A40. One of the men who entered our house.)

Q41. Sino ang kasama mong pinasakay sa kotse, kung meron man?

(Q41. Who were loaded with you into the car, if any?)

A41. Yung dalawang anak ko. Umiiyak po sila kasi ayaw nilang sumakay.

(A41. My two children. They were crying because they did not want to enter the car.)

Q42. Anong ginawa ng lalaking nagpapasakay sa inyo?

(Q42. What did the man forcing you to ride the car do?)

A42. Pinagsabihan po ako na huwag daw kaming maingay at kung hindi ay tatamaan daw kami.

(A42. He told us not to make noise or else we will get in trouble with him.)

Q43. Ano ang naging reaksiyon mo dito?

(Q43. How did you react to this?)

A43. Dahil dito pilit kong pinatatahan yung mga anak ko pero ayaw talaga nilang paawat kasi ayaw nilang sumama. Nagmakaawarin po ako sa pulis na huwag niya kaming dalhin kung saan-saan.

(A43. Because of this I tried to calm my children down but they would not stop because they did not want to go with the police. I also pleaded with the police not to bring us anywhere.)

Q44. Nang sumakay na kayo sa pulis mobil, ano ang sunod na nangyari, kung meron man?

(Q44. When you rode the police car, what happened next, if any?)

A44. Sabi ng pulis, dadalhin lang kami sa Police Station 6 pero noong nakasakay na kami, inikot-ikot muna kami sa malayong lugar bago kami dalhin sa Station 6.

(A44. The police told us that he will bring us to Police Station 6, but when we were already inside the car, he took us for a drive in distant places before he finally brought us to Police Station 6.)

Q45. Ano ang nangyari noong makarating na kayo sa Station 6?

(Q45. What happened when you arrived in Police Station 6?)

A45. Pinapasok kami sa opisina nila tapos pinaupo lang kami doon. Kasama ko noon yung mga bata na patuloy na umiiyak. Ang bunso ko nilagnat na kaya binilhan nila ng pang-lagnat, yung cool fever.

(A45. They let us in their office and made us sit. I was with my children who were continuously crying. My youngest caught fever so they brought him something for his fever, the cool fever patch.)

Q46. Sino ang kasama ninyo doon sa police station, kung meron man?

(Q46. Who were with you at the police station, if any?)

A46. May pulis na babae doon. Inalok niya kaming uminom ng kape pero sabi ko kahit tubig ayokong uminom. Pinilit niya kami pinainom ng tubig kasi sabi niya namumutla na kaming tatlo.

(A46. There was a policewoman. She offered us coffee but I retorted that I would not drink even water. She insisted that we drink water because she said that the three of us were looking pale.)

Q47. Ano ang ginawa mo, kung meron man?

(Q47. What did you do, if any?)

A47. Sinagot ko siya, sabi ko doon sa pulis na babae "Sino ba naman ang hindi mamumutla sa ginawa ng mga pulis? Wala naman po kaming ginagawang masama. Hindi naman po adik yung asawa ko."

(A47. I answered her, I told the policewoman, "Who would not turn pale at the things the police did to us? We were not doing anything wrong. My husband is not a drug addict.")

Q48. Alam mo ba kung nasa drug watchlist ang asawa mo?

(Q48. Would you know if your husband is in the drug watchlist?)

A48. Sa pagkakaalam ko po, wala po siya. Hindi naman 'yun adik.

(A48. I know he is not. He not an addict.)

Q49. Ano ang trabaho ni GG, kung meron man?

(Q49. What is GG's job, if any)

A49. Nagsa-side car po siya. Naghahatak din ng isda sa palengke. Minsan tumutulong-tulong sa may palengke.

(A49. He is a pedicab driver. He also pulls tubs of fish in the market. Sometimes, he helps out in the market.)

Q50. Ms. Witness, gaano kayo katagal nanatili sa Station 6?

(Q50. Ms. Witness, how long did you stay in Station 6?)

A50. Mag-uumaga na po noon. Simula po noong bandang hatinggabi hanggang madaling araw na ng Disyembre 16, hindi na po ako nakaalis ng Sais. Mag-uumaga na po nang pinayagan akong umalis nang sunduin ako ng dating kagawad dito sa amin na si Allan Agramon.

(A50. It was already daybreak. From around midnight until daybreak of December 16, I could not leave the police station. It was already morning when they let us leave when we were fetched by a former kagawad in our place, Allan Agramon.)

Q51. Nang umuwi ka, ano ang nangyari, kung meron man?

(Q51. When you went home, what happened, if any?)

A51. Patay na nga po si GG noong umuwi ako. Pati si Kuya Aga patay na rin. Ang sabi po sa akin, sinabi daw ng mga pulis na may pupunta daw na taga-SOCO kaya huwag daw po galawin yung bahay, pero wala namang dumating. Hating-gabi ng

December 15 po ito nagsimula, pero hanggang madaling araw ng December 16, wala namang dumating na SOCO kaya December 17 na nalinisan yung bahay.

(A51. GG was already dead. Kuya Aga was also dead. People told me that the police told them that officers from SOCO will arrive so we should not touch the scene, but no one from SOCO came. It was around midnight of December 15 when the incident started, but until dawn of December 16, no SOCO came. It was only on December 17 when we were able to clean the house.)

Q52. Pagkatapos noong insidente na iyon, ano ang ginawa ninyo, kung meron man?

(Q52. After that incident, what did you do, if any?)

A52. Pagkatapos po noong insidente, pumunta po kami sa barangay para panoorin yung kuha ng CCTV na malapit sa amin. Noong pumunta po kami kila Kagawad, napanood namin ang kuha CCTV. Nilagpasan po ng mga armadong lalaki yung bahay namin tapos doon sila nakatutok sa bahay sa katapat namin. Doon sila nakatayo sa gilid, sa dulo pa. Tapos maya-maya pa, flinashlightan nila dito sa gawi ng bahay namin. Ang nakuha na lang po sa CCTV, pumasok sila. Pagkatapos, noong lumabas na, bangkay na si GG at KuyaAga. Pagkatapos din po nito ay kumuha din po kami ng Death Certificate ni GG.

(A52. After the incident, we went the barangay hall to watch the recording of the CCTV near the house. When we went to the kagawad, we watched what was caught in the CCTV during the incident. We saw the armed men go past our house and head toward a house across ours. They were standing at the side, but far from our house. However, later, they were trained their flashlights near our house. What was caught on CCTV was how they entered. When they went out, GG and Kuya Aga were already dead. After this, we also obtained a copy of the Death Certificate of GG.)

COUNSEL: Your Honor, Witness is handing over to counsel a photocopy of the Certificate of Death of Jerry De Belen Estreller, Jr. Your Honor, may we request that this photocopy of the Certificate of Death of Jerry Estreller, Jr. be marked as **Exhibit A**.

Q53. Ms. Witness, pagkatapos nitong insidente na ito, kumusta naman ang naging pamumuhay ninyo?

(Q53. Ms. Witness, how are you after the incident?)

A53. Napakahirap po. Nang namatay na po si GG, ako na lang po ang kumakayod para sa pamilya namin. Dati ay kahit papaano napagtutulungan namin ang pangangailangan namin, pero ngayon ang hirap na. Mayroon po kaming dalawang anak na lalaki at ngayon wala na silang tatay. Ang babata pa nila.

(A53. It is very hard. When GG died, I was left alone to fend for our family. Before, we could meet our needs with the little money we both earn, but now it is so much more difficult. We have two little boys and now they do not have a father. They are still very young.)

Q54. Ano ang naging epekto nito sa buhay ninyo, kung meron man?

(Q54. How did this incident affect your life, if any?)

A54. Pagkatapos po noong insidente noong December 15, 2016, hindi namin makalimutan ang nakakatakot na pangyayaring ito. Hindi na kami natutulog sa bahay namin. Doon na po kami sa palengke namalagi ng halos dalawang buwan. At saka magmula po noon, kapag nakakakita ako ng pulis, natatakot ako. Pati ang mga anak ko, naapektuhan.

(A54. After the incident on 15 December 2016, we could not forget this frightful incident. We did not sleep in our houses anymore. We stayed at the market for almost two months. Since then, I shiver in fear every time I see cops. Even my two sons were affected.)

Q55. May gusto pa po ba kayong idagdag sa inyong mga pahayag?

(Q55. Do you have anything to add to your statements?)

A55. Wala na po.

(A55. None.)

Counsel: No further questions, Your Honor.

16 OCT 2017

IN WITNESS WHEREOF, I have affixed my signature this ____ day
of October 2017, in MAKATI CITY _____.

Zhayca
ZHAYCA ESTRELLER
Affiant

16 OCT 2017

SUBSCRIBED AND SWORN TO before me this _____
2017 in MAKATI CITY _____, affiant appearing before me and,
showing and presenting to me her DPWH bearing the number
133914023-2597-00096 valid and taking an oath before me as to the
said document.

Jessica
JESSICA ANNE G. CO
Notary Public for Makati City
Until December 31, 2018
Appointment No. M-455
Roll No. 65444
IBP No. 014819 / Lifetime
PTR No. 5919754/ Jan. 11, 2017 – Makati
1904 Antel Corporate Centre, 121 Valero St
Salcedo Village, Makati City

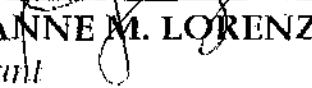
Doc. No. 14
Page No. 23
Book No. 1
Series of 2017.

**SWORN ATTESTATION OF THE LAWYER WHO CONDUCTED
OR SUPERVISED THE EXAMINATION OF THE WITNESS**

The undersigned, Atty. Kimberly Anne M. Lorenzo, of legal age, single, and with law office address at ROQUE & BUTUYAN LAW OFFICES, 1904 Antel Corporate Centre, Salcedo Village, Makati City 1227, under oath, deposes and states:

1. I am the legal counsel of the Petitioner in the above-entitled case;
2. I faithfully recorded or caused to be recorded the questions he asked and the corresponding answers that the above-named witness gave;
3. Neither I nor any other person coached the witness regarding the latter's answers; and
4. I conducted the examination of the witness at my law office located at ROQUE & BUTUYAN LAW OFFICES, 1904 Antel Corporate Centre, Salcedo Village, Makati City 1227.


IN WITNESS WHEREOF, I have hereunder affixed my signature this 16 OCT 2017 2017.



ATTY. KIMBERLY ANNE M. LORENZO
Affiant

SUBSCRIBED AND SWORN TO before me this 16 OCT 2017
2017 in MAKATI CITY affiant appearing before me and,
showing and presenting to me her IBP # 69089 bearing the
number valid until and taking an oath
before me as to the said document.

Doc. No. 115
Page No. 23
Book No. 1
Series of 2017.


JESSICA ANNE G. CO
Notary Public for Makati City
Until December 31, 2018
Appointment No. M-455
Roll No. 65444
IBP No. 014819 / Lifetime
PTR No. 5919754/ Jan. 11, 2017 - Makati
1904 Antel Corporate Centre, 121 Valero St.
Salcedo Village, Makati City