

**THE AGGRIEVED PARTY ATTY. HERMINIO HARRY L. ROQUE, JR.,
REPRESENTED BY HIS DAUGHTER AND ELDEST CHILD, BIANCA
HACINTHA R. ROQUE, PETITIONER, VS. THE HOUSE OF
REPRESENTATIVES QUAD ...**

G.R. No. 275732, December 03, 2025

Ponente: GAERLAN, J.

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GAERLAN, J.:

Petitioner Atty. Herminio "Harry" L. Roque, Jr. (Atty. Roque) seeks the writs of amparo, certiorari and prohibition against alleged encroachments upon his life, liberty, and security by the Committees on Dangerous Drugs, Public Order and Safety, Human Rights, and Public Accounts of the House of Representatives (collectively, Quad Committee).

Antecedents

Acting on several resolutions and privilege speeches calling for investigations into certain activities that allegedly threaten public order and national security,[1] the Committees on Dangerous Drugs, Public Order and Safety, Human Rights, and Public Accounts of the House of Representatives convened themselves on August 12, 2024 into a Quad Committee to jointly investigate "several public issues with linkages to each other: the proliferation of drugs, criminal activities associated with Philippine offshore gaming operators (POGOs), extra-judicial killings, among others." [2]

The Quad Committee invited Atty. Roque to attend its first investigative hearing scheduled for August 16, 2024 as a resource person, but he failed to appear.[3] Atty. Roque claimed that his absence was an inadvertent mistake. He assumed that the hearing will be held on August 15, 2024—a Thursday—because the previous House of Representatives hearing he attended regarding POGOs was also held on a Thursday. Thus, he chose to attend a previously scheduled court hearing in the City of Manila on August 15, 2024 and informed the Quad Committee in writing that he will not be able to attend its hearing on said date. By the time Atty. Roque realized that he acted on a wrong assumption, it was already too late to travel from his Quezon City residence to the hearing venue in Bacolor, Pampanga.[4]

Having been absent from the first hearing, the Quad Committee again invited Atty. Roque to attend the second hearing scheduled for August 22, 2024 at the House of Representatives complex in Quezon City.[5] He accepted the invitation and testified before the Quad Committee.[6] The committee members questioned him about his family circumstances, his business interests and activities, corporate shareholdings, and sources of income. Particularly, he was quizzed about his alleged involvement with POGOs, the alleged drastic increase in his assets, and his alleged holdings in private companies during his time in government service.[7] He also alleged that the Quad Committee held him in contempt for failing to attend the August 16, 2024 hearing and ordered his detention for 24 hours.[8]

At the conclusion of the hearing, the Quad Committee directed Atty. Roque to appear at the next hearing

scheduled on August 28, 2024 and to submit the following documents: 1) copy of deed of sale with tax return and transfer of a 1.8-hectare parcel of land located in Multinational Village, Parañaque City; 2) documents on the transfer of shareholdings from Atty. Roque to Atty. Percival Ortega with trust agreement and all other documents submitted to the Securities and Exchange Commission; 3) extrajudicial settlement of the estate of Atty. Roque's aunt, including corresponding tax returns; 4) Atty. Roque's Statements of Assets and Liabilities for the years 2016 to 2022; 5) income tax returns of Biancham, Inc., including Atty. Roque and his wife Mylah Roque from 2014 to 2022; 6) Atty. Roque's income tax return for 2018; 7) true and beneficial ownership forms filed at the Securities and Exchange Commission in relation to Biancham, Inc.; and 8) medical certificates of Atty. Roque and his wife.[9]

Atty. Roque did not attend the August 28 hearing, citing a prior commitment to attend an arbitration hearing.[10] He also failed to submit the documents sought by the Quad Committee. Instead, Atty. Roque filed a Motion to Quash[11] dated September 2, 2024, arguing that the documents sought from him are not covered by the subjects of the Quad Committee's investigation and that disclosure thereof will violate his rights to privacy and against self-incrimination.[12]

Atty. Roque claimed that the Quad Committee verbally denied the Motion to Quash in its September 4, 2024 hearing,[13] which he did not attend. Thereafter, the Quad Committee issued a Show Cause Order[14] directing Atty. Roque to explain why he should not be held in contempt for skipping the September 4, 2024 hearing. In response, Atty. Roque filed an Omnibus Motion and Compliance[15] reiterating the contents of his Motion to Quash and praying that he be excused from attending subsequent hearings of the Quad Committee, citing his medical condition and full submission of the information sought from him.[16]

On September 9, 2024, the Quad Committee notified Atty. Roque of the hearing scheduled for September 12, 2024. The notice stated that while he is not required to attend, he will nevertheless be invited if the Quad Committee decides that his presence is needed. [17]

The September 12, 2024 hearing proceeded as scheduled without Atty. Roque, leading the Quad Committee to cite him in contempt.[18] The Quad Committee also issued a Subpoena Ad Testificandum[19] directing him to appear at the next hearing scheduled for September 19, 2024 and to testify under oath relative to the matters under inquiry.[20] On the same day, the Quad Committee also issued an Order (Detention Order) directing respondent Napoleon C. Taas, the sergeant at arms of the House of Representatives, and "any law enforcement officer" to arrest and detain Atty. Roque. The Detention Order reads as follows:

In view of the attached Contempt Order issued by the Joint Committee composed of the Committees on Dangerous Drugs, Public Order & Safety, Human Rights, and Public Accounts on [September 12, 2024] against ATTY. HERMINIO-HARRY L. ROQUE, JR. and pursuant to the authority of the Speaker, under Rule IV, Section 15 (j) to sign all acts, resolution, memorials, writs, warrants and subpoena, you are hereby ordered to TAKE INTO CUSTODY and DETAIN ATTY. HERMINIO HARRY L. ROQUE, JR. at the House of Representatives, Quezon City, until he complies with the Subpoena Duces Tecum dated [August 22, 2024], or until the termination of the Joint Committee investigation.

SO ORDERED.[21] (Emphasis in the original)

Attached to the Omnibus Petition is an affidavit executed by a certain Aniline Verden (Verden) who professed to be a former staffer of the Law Offices of Atty. Roque. Verden claimed that police officers went to the office of Atty. Roque's law firm on September 14 and 15, 2024 to serve a warrant and a subpoena. At 2:27 p.m. of September 16, 2024, six National Bureau of Investigation (NBI) personnel and the officer-in-charge of security of Antel Corporate Center went to the office of Atty. Roque's law firm and served copies of the Contempt and Detention Orders. The NBI personnel inspected the office and took photographs and video footage thereof. They

also asked the office staff about the circumstances of the law office, Atty. Roque's whereabouts, and his presence at the premises. The NBI personnel were followed, thirty minutes later, by two personnel of the Office of the Sergeant at Arms of the House of Representatives to serve the September 12, 2024 subpoena.[22]

In a Resolution[23] October 1, 2024, this Court denied Atty. Roque's prayer for a writ of amparo and directed The House Of Representatives Quad Committee, consisting of the Committee On Dangerous Drugs chaired by Representative Robert Ace Barbers; Committee On Human Rights chaired by Representative Bienvenido Abante, Jr.; Committee On Public Accounts chaired by Representative Joseph Stephen Paduano; And Committee On Public Order and Safety chaired by Representative Dan Fernandez; and Napoleon C. Taas (collectively, respondents) to comment on the certiorari and prohibition aspect of the Omnibus Petition.[24] Respondents filed their Comment[25] on January 15, 2025, to which Atty. Roque replied on March 10, 2025.[26]

On June 9, 2025, the Quad Committee lifted the contempt order against Atty. Roque.[27] On June 10, 2025, the Quad Committee submitted its final report, Committee Report No. 1501.[28] The said report included several bills addressing the factual findings made during the hearings, namely: 1) defining and penalizing the crime of extrajudicial killing; 2) banning POGOs; 3) providing for the forfeiture in favor of the state of real properties unlawfully acquired by foreign nationals; 4) allowing and regulating the administrative cancellation of birth certificates fraudulently obtained by foreign nationals; and 5) defining and penalizing the crimes of conspiracy and proposal to commit espionage and misprision of espionage.[29]

Arguments of the Parties

Atty. Roque justifies direct resort to Us by transcendental importance, claiming that this Court is the best arbiter of the delimitation of the investigatory and contempt powers of the House of Representatives and its committees.[30] Atty. Roque also claims that this Court –

is the immediately better institution to adjudicate the questions raised because the assailed acts were, and are, being committed by the House of Representatives... [and] [t]rial court judges might hesitate to rule authoritatively and decisively in a case that would require reviewing the acts of Congress. Besides, there is a high probability that any ruling by a lower court will eventually be elevated to the Supreme Court for review.[31]

On the merits, Atty. Roque argues that he cannot be compelled to attend the Quad Committee hearings, because the right against self-incrimination applies to administrative and legislative inquiries when the witness or resource person is placed in the position of an accused on trial. The Quad Committee investigation is essentially a publicized prosecutorial inquiry into the alleged illegal activities committed by POGO operators, and not an aid to legislation. Atty. Roque accuses the Quad Committee of reeling him into its "publicity trial", using an unofficial transcript of his questioning by Representative Gerville Luistro (Rep. Luistro) as basis.[32] Atty. Roque claims that the line of questioning by Rep. Luistro and the other members of the Quad Committee insinuated that he used dummies to conceal his business interests, failed to file required financial statements, and withheld information from his Statements of Assets, Liabilities, and Net Worth (SALN), thus effectively usurping the investigatory and adjudicatory powers of the executive and judicial branches.[33] Accordingly, handing over the documents required by Quad Committee would amount to self-incrimination. Worse, the Quad Committee continued to abusively wield the legislative power of inquiry against Atty. Roque even after another resource person named Katherine Cassandra Ong (Ong) categorically stated that Atty. Roque had no connection with the offshore gaming operations of the companies Lucky South 99 and Whirlwind.[34] Atty. Roque argues that the Quad Committee investigation violates Article VI, Section 26 of the Constitution, as it lacks a legislative purpose and violates the rights of the resource persons involved. The subpoena duces tecum issued against him violates not only his right against self-incrimination but also his right to privacy. Atty. Roque claims that the documents sought from him by

the Quad Committee are all personal matters which have nothing to do with the alleged illegal activities of POGOs; and are just being elicited for the purpose of further incriminating and implicating him in such illegal activities.[35]

Respondents ask Us to dismiss the petition outright for violating the hierarchy of courts, because transcendental importance is no longer enough to justify direct resort to the Supreme Court, when the case involves factual questions which must be resolved at the trial or appellate levels. Atty. Roque's petition raises questions of fact, such as the relevance to the legislative inquiry of the questions propounded to him, and the contemptibility of his acts.[36] At any rate, the petition does not raise any question of transcendental importance. It involves neither public property nor a clear disregard of a constitutional or statutory prohibition. Furthermore, Atty. Roque is not the first or only person to be subjected to a congressional inquiry.[37]

On the merits, respondents argue that the August 22, 2024 hearing was not tainted with grave abuse of discretion. The questions and documents asked of Atty. Roque by the committee members are material and relevant to the matter of illegal POGO-associated activities and Atty. Roque's involvement therein.[38] While the Agenda does not mention the specific bills subject of the hearing, the legislative thrust thereof is still apparent from the specific matters mentioned in the Agenda, such as the alleged increase in enrolment of Chinese students in schools in Cagayan, the regulation of special retiree and investor visas, and the proliferation of false birth certificates, which are all connected to the illegal POGO-associated activities that were discussed in the hearing.[39] In any case, the questions asked of Atty. Roque by Rep. Luistro and the other members of the committee are pertinent to the matter of whether incumbent public officials like Atty. Roque played a role in the proliferation of illegal POGO-associated activities, which is turn relevant to several aspects of legislation such as anti-corruption, money laundering, and the regulation of gambling.[40] Atty. Roque's constitutional rights were not infringed during the August 22, 2024 hearing. First, Atty. Roque cannot use the right against self-incrimination to justify his non-appearance in the Quad Committee hearings. The right against self-incrimination is generally inapplicable to legislative hearings, and may only be invoked when an incriminating question is asked.[41] Second, the subpoena duces tecum issued by the Quad Committee does not violate Atty. Roque's right to privacy, as he does not have a reasonable expectation of privacy in his financial transactions during his tenure as a government official. Financial transparency is a major plank of the law on public officers, which specifically requires government employees to regularly submit SALN, and correspondingly gives the public a right to know about the assets, liabilities, and business interests of government officials. At any rate, Atty. Roque himself volunteered to submit some documents mentioned in the subpoena duces tecum.[42]

Ruling

The petition has been rendered moot and academic by the lifting of the contempt order and the adjournment of the 19[th] Congress.

In *Balag v. Senate*,[43] the Court dismissed Arvin R. Balag's petition for certiorari against the contempt and detention orders issued against him by the Senate, because he had already been released from detention and the pertinent legislative inquiry was already terminated.[44] Nevertheless, the Court took the opportunity to rule that the period of detention under the legislative contempt power is temporally limited to the duration of the legislative inquiry under which the power is invoked, or of the Congress which invoked said power:

The Court finds that the period of imprisonment under the inherent power of contempt by the Senate during inquiries in aid of legislation should only last until the termination of the legislative inquiry under which the said power is invoked. In *Arnault*, it was stated that obedience to its process may be enforced by the Senate Committee if the subject of investigation before it was within the range of legitimate legislative inquiry and the proposed testimony called relates to that subject. Accordingly, as long as there is a legitimate legislative

inquiry, then the inherent power of contempt by the Senate may be properly exercised. Conversely, once the said legislative inquiry concludes, the exercise of the inherent power of contempt ceases and there is no more genuine necessity to penalize the detained witness.

Further, the Court rules that the legislative inquiry of the Senate terminates on two instances:

First, upon the approval or disapproval of the Committee Report...

....

Evidently, the Committee Report is the culmination of the legislative inquiry. Its approval or disapproval signifies the end of such legislative inquiry and it is now up to the Senate whether or not to act upon the said Committee Report in the succeeding order of business. At that point, the power of contempt simultaneously ceases and the detained witness should be released. As the legislative inquiry ends, the basis for the detention of the recalcitrant witness likewise ends.

Second, the legislative inquiry of the Senate also terminates upon the expiration of one (1) Congress. As stated in *Neri*, all pending matters and proceedings, such as unpassed bills and even legislative investigations, of the Senate are considered terminated upon the expiration of that Congress and it is merely optional on the Senate of the succeeding Congress to take up such unfinished matters, not in the same status, but as if presented for the first time. Again, while the Senate is a continuing institution, its proceedings are terminated upon the expiration of that Congress at the final adjournment of its last session. Hence, as the legislative inquiry ends upon that expiration, the imprisonment of the detained witnesses likewise ends.[45]

Sections 15 and 16 of the Rules of Procedure Governing Inquiries in Aid of Legislation in the House of Representatives states:

Section 15. Termination of Inquiry. – The committee shall terminate an inquiry, and submit a report thereon within sixty (60) calendar days from the date of commencement unless the committee, by a majority vote of members present, there being a quorum, deems it necessary to extend such inquiry. The inquiry commences on the date of referral of the privilege speech, resolution or petition or information to the concerned committee.

Section 16. Report of Committee. – The report shall contain the findings of the committee on the subject matter of the inquiry, the grounds on which its findings are based and its recommendations, if any. The report shall be approved by a majority vote of the Members present, there being a quorum. Members who vote against the approval of the report and who do not sign the majority report may make concurring or dissenting opinions. The report, together with any concurring and dissenting opinion, shall be filed with the Secretary General who shall include the same in the Order of Business within three (3) days from receipt thereof[.]

As explained in *Balag*, the submission of the committee report is concomitant to the committee's duty to terminate the inquiry. When the committee submits its final report, the inquiry ends, and any contempt order issued in such inquiry ceases to have any purpose or effect. Here, not only did the Quad Committee lift the contempt order against Atty. Roque on June 9, 2025,[46] it also submitted its final committee report on June 10, 2025. The 19th Congress then adjourned sine die on June 11, 2025.[47] "A case is considered moot and academic when a determination is sought on a matter which, when rendered, cannot have any practical effect on the existing controversy, or where no practical relief can be granted." [48] "That a court will not sit for the purpose of trying moot cases and spend its time in deciding questions the resolution of which can not in any way affect the rights of the person or persons presenting them is well settled." [49] With the lifting of the contempt order, the cessation of the Quad Committee's inquiry, and the expiration of the 19th Congress, this Court no longer grant any practical relief to Atty. Roque.[50] The petition must perforce be dismissed.

ACCORDINGLY, the present Petition for Certiorari and Prohibition is DISMISSED.

SO ORDERED.

Gesmundo, C.J., Leonen, S.A.J., Caguioa, Hernando, Lazaro-Javier, Inting, Zalameda, Rosario, Dimaampao, Marquez, Singh, and Villanueva, JJ., concur.

J. Lopez,[*] J., on official leave.

Kho, Jr.,[**] J., on official business.

[*] On official leave.

[**] On official Business.

[1] Privilege Speech of Representative Aurelio "Dong" Gonzales, Jr. delivered in plenary on August 5, 2024 on extrajudicial killings, illegal drugs, and illegal activities; House Resolution No. 1346 on the PHP 3.6 billion worth of "shabu" Municipality of Mexico, Pampanga, and PHP 1.3 billion worth of shabu discovered in the City of Mabalacat, Pampanga; House Resolution No. 1351 on the PHP 3.8 Billion worth of "shabu" intercepted at the port of Subic Bay, Subic Bay Freeport Zone; House Resolution No. 14 on the cases of slain victims of the war on drugs and all related activities; House Resolution No. 1847 on the alleged drug-related extrajudicial killings under the bloody war on drugs of the Duterte Administration; Privilege Speech of Representative France Castro delivered on November 8, 2023 on the alleged extrajudicial killings during the Duterte Administration; Motu Proprio Inquiry on the alleged irregularities in the procurement process and unlawful contracts entered into by the Municipality of Mexico, Pampanga, in violation of relevant auditing, procurement, and other laws; Motu Proprio regarding proliferation of criminal activities and unlawful acts linked to the Philippine Offshore Gaming Operators; House Resolution No. 1629 on the spurious schemes employed by foreign nationals in the various parts of the country and the consequent risks to the country's national security and economy; House Resolution No. 1666 on the surge of alleged Chinese students enrolling in the various higher educational institutions in Cagayan province, particularly in the city of Tuguegarao; House Resolution No. 1703 on the entry and influx of a big number of Chinese nationals in our country who are now enrolled and studying in a school in Cagayan province; House Resolution No. 1771 on the processes of issuance of special resident retiree's visas (SRR V) and special investor's resident visa (SIRV), and the delayed registration of births as possible avenues enabling the influx of Chinese nationals in the Philippines; House Resolution No. 1802 on the proliferation of allegedly falsified certificates of live births and passports issued to foreign nationals; House Resolution No. 1810 on the proliferation of fake birth certificates; Privilege Speech of Representative Bienvenido M. Abante, Jr. delivered on April 30, 2024, on restoring honesty and integrity of the Bureau of Immigration in relation to national security and the protection of institutions from alien infiltration; Privilege Speech of Representative Faustino "Inno" Dy V delivered on March 5, 2024 regarding foreign nationals in Isabela obtaining loans from banks. Agenda of Third Joint Public Hearing, Committees on Dangerous Drugs, Public Order and Safety, Human Rights, and Public Accounts attached to Notice of Joint Committee Meeting dated August 28, 2024 and September 12, 2024 Contempt Order. (Rollo, vol. 1, pp. 84-86, 107).

[2] House of Representatives, Quad Committee Kicks Off Probe Into Links Of POGOs To Drug Trade, EJKs, August 13, 2024, available at <https://congress.gov.ph/media/view/?content=5403&title=QUAD-i-COMMITTEE+KICKS+OFF+PROBE;archive> link at <https://web.archive.org/web/20240928080850/https://congress.gov.ph/media/view/?content=5403&title=QUAD-i-COMMITTEE+KICKS+OFF+PROBE> (last accessed on September 28, 2024).

[3] Rollo, vol. 1, p. 7.

[4] Id.

[5] Id. at 82.

[6] Id. at 36-48.

[7] Id.

[8] Id. at 116-131.

[9] Id. at 7-8, 82.

[10] Id. at 8, 71.

[11] Id. at 87-93.

[12] Id.

[13] Id. at 96.

[14] Id. at 94.

[15] Id. at 95-105.

[16] Id. at 96.

[17] Id. at 106.

[18] Id. at 107-108.

[19] Id. at 109-110.

[20] Id. at 113-114.

[21] Id. at 114.

[22] Id. at 74-75.

[23] Id. at 207-223.

[24] Id. at 221-221.

[25] Rollo, vol. 2, pp. 498-583.

[26] Rollo, vol. 6, pp. 2496-2524.

[27] Gabriel Pabico Lalu, Contempt orders lifted as House quad comm ends, but solons vow justice, PHIL. DAILY INQUIRER, June 10, 2025, available at <https://newsinfo.inquirer.net/2069145/contempt-orders-lifted-as-house-quad-comm-ends-but-solons-vow-justice>, archive link at <https://archive.is/d99pG> (last accessed on November 26, 2025); Dominique Nicole Flores, House Quad Comm lifts contempt orders vs Harry Roque, wife, PHILSTAR.COM, June 10, 2025, available at <https://www.philstar.com/headlines/2025/06/10/2449374/house-quad-comm-lifts-contempt-orders-vs-harry-roque-wife>, archive link at <https://archive.md/GXTcw> (last accessed on November 26, 2025); Ellson Quismorio, Harry Roque, wife, 2 others' contempt and detention orders lifted in final quad-comm hearing, MANILA BULLETIN, June 9, 2025, available at <https://mb.com.ph/2025/06/09/harry-roque-wife-2-others-contempt-and-detention-orders-lifted-in-final-quad-comm-hearing> (last accessed on November 26, 2025). See also House of Representatives, FIFTEENTH PUBLIC

HEARING OF THE HOUSE QUAD-COMMITTEE - Part 2 (JUNE 09, 2025) (livestream recording), available at <https://youtu.be/8UKsdZoJzIY?t=2527> (last accessed on November 26, 2025).

[28] House of Representatives Committee Report No. 1501 (2025), 19th Congress, 3rd Session, Joint Committee comprised of the Committees on Dangerous Drugs, Public Order and Safety, Human Rights, and Public Accounts, available at https://docs.congress.hrep.online/legisdocs/first_19/CR01501.pdf, archive link at https://web.archive.org/web/20251126064321/https://docs.congress.hrep.online/legisdocs/first_19/CR01501.pdf (last accessed on November 26, 2025).

[29] Id. Attachments after p. 66 of the Report.

[30] Rollo, vol. 1, pp. 14-18.

[31] Id. at 19.

[32] Id. at 23-33.

[33] Id. at 33-48.

[34] Id. at 45-49.

[35] Id. at 56-66.

[36] Id. at 536-537.

[37] Id. at 538-539.

[38] Id. at 544-545.

[39] Id. at 545-549.

[40] Id. at 550-553.

[41] Id. at 556-564.

[42] Id. at 564-572.

[43] 835 Phil. 451 (2018) [Per J. Gesmundo, En Banc].

[44] Id. at 461-462.

[45] Id. at 471-473.

[46] Roque himself acknowledged the lifting of the contempt order in a social media post. Harry Roque, Statement of Atty. Harry Roque On the lifting of the contempt order, June 10, 2025, available at <https://www.facebook.com/HarryRoque/posts/%F0%9D%97%A6%F0%9D%98%81%F0%9D%97%AE%F0%9D%98%81%F0%9D%97%B2%F0%9D%97%BA%F0%9D%97%B2%F0%9D%97%BB%F0%9D%98%81-%F0%9D%97%BC%F0%9D%97%B3-%F0%9D%97%94%F0%9D%98%81%F0%9D%98%81-%F0%9D%98%86-%F0%9D%97%9B%F0%9D%97%AE%F0%9D%97%BF%F0%9D%97%BF%F0%9D%98%86-%F0%9D%97%A5%F0%9D%97%BC%F0%9D%97%BE%F0%9D%98%82%F0%9D%97%B2-%F0%9D%97%A2%F0%9D%97%BB-%F0%9D%98%81%F0%9D%97%85%F0%9D%97%B2-%F0%9D%97%B9%F0%9D%97%B6%F0%9D%97%B3%F0%9D%98%81%F0%9D%97%B6%F0%9D%97%BB%F0%9D%97%B4-%F0%9D%97%BC%F0%9D%97%B3-%F0%9D%98%81%F0%9D%97%B5%F0%9D%97%B2-%F0%9D%97%B0%F0%9D%97%BC%F0%9D%97%BB%F0%9D%98%81%F0%9D%97%B2%F0%9D%97%BA%F0%9D%97%BD%F0%9D%98%81-%F0%9D%97%BC%F0%9D%97%BF%F0%9D%97%B1%F0%9D%97%B2%F0%9D%97%BFthe-lif>

ting-of/1304615377687328/, archive link at <https://archive.md/ooKMN> (last accessed on November 27, 2025).

[47] Journal (No. 39), House of Representatives, 19[th] Congress, 3[rd] Session (June 9-11, 2025), p. 113, available at https://docs.congress.hrep.online/legisdocs/journals_19/Journal-01588-20250609.pdf, archive link at https://web.archive.org/save/https://docs.congress.hrep.online/legisdocs/journals_19/Journal-01588-20250609.pdf (last accessed on November 27, 2025).

[48] Heirs of Eugenia V. Roxas, Inc. v. IAC, 255 Phil. 558, 574 (1989) [Per J. Cortes, Third Division], citing Meralco Workers Union v. Yatco, 125 Phil. 590, 594 (1967) [Per J. Makalintal, En Banc] and Bongat v. Bureau of Labor Relations, 220 Phil. 604, 608 (1985) [Per J. Cuevas, Second Division].

[49] Beech v. Crossfield, 12 Phil. 555 (1909) [Per J. Willard, En Banc].

[50] See Rollo, vol. 1, pp. 66-67.

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