REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

SECOND DIVISION

MARKET STRATEGIC FIRM, INC., *Petitioner,*	**CTA CASE No. 9280**
-versus-	**Members:** **CASTAÑEDA, JR., Chairperson, MINDARO-GRULLA, and BACORRO-VILLENA, *JJ.***
COMMISSIONER OF INTERNAL REVENUE, *Respondent.*	**Promulgated:** FEB 13 2020 11:47 AM

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RESOLUTION

On May 10, 2019, this case was submitted for decision.

On January 24, 2020, petitioner filed its Motion for Suspension of Proceedings due to its intended discussions and negotiations with the respondent for possible settlement of this case.

However, absent actual compromise agreement entered into, the parties cannot practically keep hostage this Court's mandate, upon submission for decision, to promulgate its ruling, by mere allegation or manifestation of a possible settlement agreement.

It must be realized that the instant case is for an assessment of alleged deficiency taxes and that no appeal from the decision of the respondent shall suspend the payment, levy or distraint[1] aside from exceptional cases provided for by law.

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[1] Republic Act 1125, Section 11.

It is only upon submission of a Judicial Compromise Agreement signed by authorized signatories with the approval of the National Evaluation Board and full payment of the Judicial Compromise Amount[2] that the Court sees no bar in approving the same. Absent this, the promulgation of the decision must be in order.

WHEREFORE, premises considered, the Motion for Suspension of Proceedings is hereby **DENIED** for lack of merit.

SO ORDERED.

JUANITO C. CASTAÑEDA, JR.
Associate Justice

CIELITO N. MINDARO-GRULLA
Associate Justice

JEAN MARIE A. BACORRO-VILLENA
Associate Justice

[2] Section 6 of Revenue Regulations (RR) No. 30-2002, as amended by RR No. 9-2013.