REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

PROCTER & GAMBLE PHILIPPINES, INC.,
Petitioner,

- versus - C.T.A. CASE NO. 5000

COMMISSIONER OF INTERNAL REVENUE,
Respondent.

Promulgated:
APR 20 1995

x -

RESOLUTION

Considering the "Manifestation and Notice of Tax Credit Certificate" filed by petitioner on March 16, 1995 informing this court that respondent Commissioner of Internal Revenue has issued in favor of petitioner a Tax Credit Certificate (SN 000422) in the amount of P6,800,000.00 representing overpaid withholding tax on cash dividend for the years 1991 and 1992, which tax credit certificate is, in effect, a satisfaction of the judgment rendered by this court in favor of petitioner on March 10, 1995, the dispositive portion of which states as follows:

> "WHEREFORE, in view of all the foregoing, respondent is hereby ordered to refund or issue a tax credit certificate in the amount of six million eight hundred thousand (P6,800,000.00) pesos to the petitioner representing the overpaid withholding tax on dividends remitted to its parent company, Procter & Gamble Co., U.S.A.
>
> SO ORDERED."

the court resolved to consider this case closed and terminated.

SO ORDERED.

ERNESTO D. ACOSTA
Presiding Judge

RAMON O. DE VEYRA
Associate Judge

MANUEL K. GRUBA
Associate Judge