REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

FAR EAST BANK AND TRUST COMPANY,
Petitioner,

\- versus -

C.T.A. CASE NO. 5074

COMMISSIONER OF INTERNAL REVENUE,
Respondent.

Promulgated:
FEB 14 1995

x -x

RESOLUTION

Confirming the order in open court on February 3, 1995, petitioner's motion and manifestation that its claim for refund or tax credit in this case be dismissed with respect to the withholding tax paid on extrajudicial foreclosure sale because a Tax Credit Certificate (SN 000435) has been issued in its favor by respondent Commissioner of Internal Revenue in the sum of P10,750,000.00, and that the issue relative to petitioner's claim for refund or tax credit of the documentary stamp tax shall remain to be in litigation, is GRANTED.

Let petitioner's claim for refund or tax credit of the withholding tax in question be therefore considered closed and terminated.

SO ORDERED.

ERNESTO D. ACOSTA
Presiding Judge

RAMON O. DE VEYRA
Associate Judge

MANUEL K. GRUBA
Associate Judge