REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

THE MANILA BANKING CORPORATION,
Petitioner,

- versus -

C.T.A. CASE NO. 4366

COMMISSIONER OF INTERNAL REVENUE,
Respondent.

1/31/92

x - - - - - - - - - - - - - - - x

RESOLUTION

Acting on the "Joint Motion To Dismiss" filed by the parties on December 9, 1991 seeking dismissal of the petition for review on the ground that both parties had agreed to compromise the amount of P4,709,819.69 representing deficiency documentary stamp tax assessment on bills payable for the year 1984. In a letter dated October 25, 1991 the Deputy Commissioner, Mr. Victor Deoferio Jr., accepted the offer of compromise by TMBC and request immediate payment of the compromise amount of P235,490.98, in a subsequent letter, however, (Annex B, p. 724, CTA records) noting that TMBC is under receivership granted the request of

38

petitioner that payment of the compromise sum be made upon liquidation in accordance with the Civil Code.

ACCORDINGLY, let this case be DISMISSED and thus considered closed and terminated.

SO ORDERED.

Quezon City, Metro Manila, January [illegible], [illegible]

ERNESTO D. ACOSTA
Associate Judge

CONSTANTE C. ROAQUIN
Associate Judge