REPUBLIC OF THE PHILIPPINES
COURT OF TAX APPEALS
QUEZON CITY

NATIONAL DEVELOPMENT COMPANY,
Petitioner,

- versus - C.T.A. CASE NO. 1573

COMMISSIONER OF INTERNAL
REVENUE,
Respondent.
x - - - - - - - - - - - - - - - x

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R E S O L U T I O N

This Court takes note of the manifestation filed on June 27, 1989 by petitioner regarding its offer to compromise the deficiency witholding tax for 1960, 1961, and 1962 wherein respondent agreed to waive his right for reasons stated in his letter of April 14, 1989, to impose the 25% surcharge by way of compromise under Section 204 of the Tax Code and at the same time accepting the offer of petitioner to pay its liability in two equal installments, the first installment to be paid upon acceptance of said offer and the second equal installment to be paid within three months from the first installment.

On October 13, 1989 petitioner filed its compliance to the compromise agreed upon, showing proof of payments made by petitioner in favor of respondent, to the full satisfaction of the parties, as evidenced by the following:

Confirmation Receipt No.	BIR Payment Order No.	Date	Amount Paid
B-16559276	C-5345888	May 5, 1989	₱2,088,119.74
B-17006702	C-6900735	August 4, 1989	2,088,119.75
Total payments made - - - - - - - - - - - - - -			₱4,176,239.49

IN VIEW OF THE FOREGOING, the Court takes note of the payments made by petitioner for the satisfaction of the judgment rendered by this Court, and as affirmed by the Supreme Court on June 30, 1987, thereby rendering the issuance of a writ of execution moot.

WHEREFORE, the manifestation and compliance filed by petitioner is hereby NOTED and thus considers the above-entitled case closed and terminated.

SO ORDERED.

Quezon City, Metro Manila, October 18, 1989.

AMANTE FILLER
Presiding Judge

ALEX Z. REYES
Associate Judge

CONSTANTE C. ROAQUIN
Associate Judge