

REPUBLIC OF THE PHILIPPINES  
COURT OF TAX APPEALS  
QUEZON CITY

Third Division

ASIAN COLLEGE OF SCIENCE  
AND TECHNOLOGY  
FOUNDATION (DUMAGUETE),  
INC.,

CTA CASE NO. 10366

Petitioner,

Members:

- versus -

RINGPIS-LIBAN, *Chairperson*, and  
MODESTO-SAN PEDRO, *JJ*.

SECRETARY OF FINANCE and  
COMMISSIONER OF INTERNAL  
REVENUE,

Promulgated:

Respondent.

OCT 12 2022

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RESOLUTION

For resolution is petitioner's Motion to Withdraw Petition for Review filed on July 15, 2022, which manifests that with the issuance of Revenue Regulations No. 3-2022 dated April 7, 2022, its petition has been rendered moot and academic relative to the issue of the definition of "non-profit." Comments filed by both respondents interposed *no objection* to the withdrawal of the petition.

**WHEREFORE**, in the exercise of the Court's discretion under Rule 50, Section 3 of the Rules of Court, the motion is **GRANTED**. The case is considered **DISMISSED**, *without passing upon any of the substantive issues raised*.

SO ORDERED.

  
MA. BELEN M. RINGPIS-LIBAN  
Associate Justice

  
MARIA ROWENA MODESTO-SAN PEDRO  
Associate Justice