

Republic of the Philippines  
**CHIEF JUSTICE REYNATO S. PUNO**  
**SUPREME COURT**  
Manila

**RONEO S. CLAMOR, LEONILO  
DOLORICON, OFELIA B. BALLETA,  
RAYMUNDO L. APUHIN, MARGIE M.  
OCASLA, REYNAN A. GABAN, MA.  
LUCRECIA QUINAWAYAN, ROY S.  
MONTES, MARIA CHRISTINA S.  
MACABENTA, EDGARDO GONZALES  
AND COMMUNITY MEDICINE  
DEVELOPMENT FOUNDATION (COMMED)  
REPRESENTED BY ITS SECRETARY DR.  
JULIE P. CAGUIAT.**

Petitioners,

- versus -

G.R. No. 191003, February 9, 2010  
Very Urgent Petition for Habeas Corpus

**GEN. VICTOR S. IBRADO, AFP CHIEF OF  
STAFF; LT. GEN. DELFIN N. BANGIT,  
COMMANDING GENERAL, PHILIPPINE  
ARMY; BRIG. GEN. JORGE SEGOVIA,  
CHIEF OF THE 2<sup>ND</sup> INFANTRY DIVISION,  
PHILIPPINE ARMY; COL. AURELIO  
BALADAD, COMMANDER OF THE 202<sup>ND</sup>  
INFANTRY BRIGADE, PHILIPPINE  
ARMY; PHILIPPINE NATIONAL POLICE  
DIRECTOR GENERAL JESUS A.  
VERZOSA; AND P/SUPT. MARION  
BALONGLONG, RIZAL PHILIPPINE  
NATIONAL POLICE.**

Respondents.

X-----X

**VERY URGENT PETITION  
FOR HABEAS CORPUS**

**PETITIONERS**, through the undersigned counsel, unto the Honorable Chief

Justice of the Supreme Court, most respectfully state that:

## PREFATORY STATEMENT

**“The annals of juridical history fail to reveal a case quite as remarkable as the one which this application for *habeas corpus* submits for decision. While hardly to be expected to be met with in this modern epoch of triumphant democracy, yet, after all, the cause presents no great difficulty if there is kept in the forefront of our minds the basic principles of popular government, and if we give expression to the paramount purpose for which the courts, as an independent power of such a government, were constituted. The primary question is – Shall the judiciary permit a government of the men instead of a government of laws to be set up in the Philippine Islands?**

xxx      xxx      xxx

**The essential object and purpose of the writ of *habeas corpus* is to inquire into all manner of involuntary restraint as distinguished from voluntary, and to relieve a person therefrom if such restraint is illegal.” [Villavicencio v. Lukban, G.R. No. L-14639, March 25, 1919, MALCOM, J.] (Emphasis supplied)**

1. Shall the judiciary permit a government of the men instead of a government of laws to be set up in the Philippine Islands? These remarkable challenge posed by Justice Malcolm almost a century ago has never lost its weight and substance to the present day challenges being faced by the courts – challenges caused by the unlawful and unconstitutional acts of men and which are reminiscent of the dark days of martial law.
2. This very urgent petition for *habeas corpus* strongly seeks to immediately relieve forty-three (43) innocent men and women of the medical profession from the unlawful and involuntary deprivation of personal liberty caused by state security forces.
3. Petitioner-individuals are members of the respective immediate families of said innocent men and women of the medical profession – and they are filing this petition on their behalf – who are continued to be illegally and involuntary deprived of their personal liberty by respondents, thus:

Petitioner **RONEO S. CLAMOR** is filing this petition on behalf of his wife, Dr. Merry B. Mia-Clamor; petitioner **LEONILO DOLORICON** on behalf of his wife, Angela Doloricon; petitioner **OFELIA B. BALLETA** on behalf of her daughter Jane B. Balleta; petitioner **RAYMUNDO L. APUHIN** on behalf of his nephew Gary Liberal, RN; petitioner **MARGIE M. OCASLA** on behalf of her mother, Delia M. Ocasla; petitioner **REYNAN A. GABAN** on behalf of his aunt Lydia Obara; petitioner **MA. LUCRECIA QUINAWAYAN** on behalf of her daughter Ma. Teresa R. Quinawayan, midwife; petitioner **ROY S. MONTES** on behalf of his brother Dr. Alexis S. Montes, petitioner **MARIA CHRISTINA S. MACABENTA** on behalf of her husband, Reynaldo T. Macabenta, and petitioner **EDGARDO GONZALES** on behalf of his daughter Jacqueline Gonzales.

Petitioner Community Medicine Development Foundation (COMMED), as represented herein by its Secretary Dr. Juliet P. Caguiat, is filing this petition on behalf of all the forty-three (43) men and women of the medical profession who are leaders and members of said foundation.

A copy of the foundation's Board Resolution No. 01-2010 dated February 6, 2010 authorizing Dr. Juliet P. Caguiat to represent petitioner in this petition and sign all papers and documents relative thereto is attached hereto as **Annex "A"**.

4. This very urgent petition for *habeas corpus* is filed before the Honorable Chief Justice in accordance with Section 2, Rule 102 of the Rules of Court, thus:

**"RULE 102**

**HABEAS CORPUS**

**Sec. 2. Who may grant the writ. - The writ of habeas corpus may be granted by the Supreme Court, or any member thereof, on any day and at any time, or by the Court of Appeals or any member thereof in the instances authorized by law, and if so granted it shall be enforceable anywhere in the Philippines, and may be made returnable before the court or any member thereof, or before the Court of First Instance, or any judge thereof for the hearing and decision on the merits.**

**It may also be granted by a Court of First Instance, or a judge thereof, on any day and at any time, and returnable before himself, enforceable only within his judicial district.”** (Emphasis supplied)

5. Moreover, due to the extreme urgency of the matter and the peculiar circumstances of this petition where the innocent subjects thereof have been forcibly taken and arrested *without* any lawful cause and through a *patently* unconstitutional search warrant and are continued to be held completely *incommunicado* by respondents inside Camp Capinpin in Tanay, Rizal, this petition is filed directly before the Honorable Chief Justice for the immediate relief of said individuals from the unlawful and involuntary deprivation of liberty caused by state security forces.
6. Starting on February 1, 2010, leaders and members of the Community Medicine Development Foundation (COMMED) and Community for Health Development (CHD) have been conducting a comprehensive *Community First Responders Health Training* in a training facility within a farmhouse located at 266 Dela Paz St., Brgy. Maybangcal, Morong, Rizal. The farmhouse is owned by Dr. Melecia Velmonte, COMMED’s chair of the board and a renowned and respected infectious disease specialist in the medical profession. The last day of the training was supposed to be on February 7, 2010.
7. On February 6, 2010, however, at around 6:15 a.m., at least 300 heavily-armed soldiers and policemen headed by Col. Aurelio Baladad, commander of the 202<sup>nd</sup> Infantry Brigade, and P/Supt. Marion Balonglong of the Rizal Provincial Police unlawfully entered and searched the farmhouse.
8. The military and police brought during the illegal search eight (8) 6 x 6 military trucks, two (2) armored personnel carriers, one (1) ambulance, one (1) KIA Pride vehicle, and an undetermined number of PNP vehicles. The plate numbers of all said military and police trucks and vehicles had been purposely covered to avoid identification.

9. Dr. Velmonte's helper was held at gunpoint to open the farmhouse gate for the military and police. Afterwards, an illegal search was conducted within the house and the training facility located within the compound. Forty-three (43) men and women found within the premises were hand tied, blindfolded and forced to line up.
  
10. Dr. Velmonte, who herself was an instructor during the training, immediately strongly protested the illegal search and arrests. She asked for the reasons of the illegal search and the illegal arrests of the participants of the training and demanded for a search warrant. Her protestations, however, fell on deaf ears.
  
11. Later, upon the intervention of Dr. Velmonte's son, Jose Manuel, a search warrant was presented by Col. Aurelio Baladad. The search warrant, however, is directed against a person **not** a resident of the farmhouse **nor** known to and heard of by Dr. Velmonte and the participants of the training. **Worse, the search warrant is bereft of the requisite constitutional requirements.** The full text of the same is as follows:

"Republic of the Philippines  
 REGIONAL TRIAL COURT  
 FOURTH JUDICIAL REGION  
 Branch 22  
 IMUS, CAVITE

PEOPLE OF THE PHILIPPINES  
 Plaintiff,

- versus -

**MARIO CONDES of Brgy. Maybancal,**  
**Morong, Rizal**

Accused.

x-----x

SEARCH WARRANT NO. 1565-10  
 FOR:  
 VIOLATION OF RA 8294 (Illegal  
 Possession of Firearm)

SEARCH WARRANT

THIS SEARCH WARRANT IS VALID  
 ONLY UNTIL 14 FEBRUARY 2010

TO ANY PEACE OFFICER:

GREETINGS:

It appearing to the satisfaction of the undersigned after examining under oath  
 PSUPT. MARION D. BALONGLONG and his witness PO1 ARNEL TARASONA

that there is a probable cause to believed (sic) that Violation of RA 8294 (Illegal Possession of Firearms and Ammunition) has been committed and that there are good sufficient reason to believed (sic) that MARIO CONDES has his possession or control at Brgy. Maybangcal, Morong, Rizal the following described properties to be seized to wit:

- a. M16 Rifle
- b. Caliber 9mm Pistol
- c. 12 Gauge Shotgun
- d. Caliber 45 Pistol

You are hereby commanded to make an immediate search at any time in the day and night of the premises above described and forthwith seized and take possession of the above described properties and bring said properties to the undersigned to be dealt as the law directs.

WITNESS IN MY HAND this 5<sup>th</sup> day of February, 2010 at Imus, Cavite, Philippines.

(Sgd.)  
CESAR A. MANGROBANG  
JUDGE”

(Emphasis supplied)

A copy of said search warrant is attached hereto as **Annex “B”**.

12. Upon examination of said search warrant, Dr. Velmonte and her son protested to Col. Baladad the illegality and unconstitutionality of the same due to the following matters:

- (a) The search warrant is directed against a person named MARIO CONDES, who is not a resident of the farmhouse nor known to and heard of by Dr. Velmonte and her son and the participants of the training;
- (b) The search warrant did not describe with particularity the place to be searched, as it only indicated therein the address “Brgy. Maybangcal, Morong, Rizal” where so many houses are located; and
- (c) The search warrant did not state that the house to be searched is the farmhouse of Dr. Velmonte located at 266 Dela Paz St., Brgy. Maybangkal, Morong, Rizal.

13. Verily, the search warrant issued by Judge Cesar A. Mangrobang is a blatant disregard and violation of Section 2, Article III of the 1987 Constitution, thus:

**“Section 2. The right of the people to be secure in their persons, houses, papers, and effects against unreasonable searches and seizures of whatever nature and for any purpose shall be inviolable, and no search warrant or warrant of arrest shall issue except upon probable cause to be determined personally by the judge after examination under oath or affirmation of the complainant and the witnesses he may produce, and particularly describing the place to be searched and the persons or things to be seized.”** (Emphasis supplied)

14. Their protestations, however, fell on deaf ears as the military and police continued the illegal search in every inch of the whole premises without the presence of Dr. Velmonte and other lawful occupants thereof as the latter had all been forcibly confined in one corner of the premises. This is a violation of Section 8, Rule 126 of the Rules of Criminal Procedure, thus:

**“Sec. 8. Search of house, room, or premises to be made in presence of two witnesses. – No search of a house, room, or any other premises shall be made except in the presence of the lawful occupant thereof or any member of his family or in the absence of the latter, two witnesses of sufficient age and discretion residing in the same locality.”** (Emphasis supplied)

15. Moreover, the search warrant was issued by Judge Cesar A. Mangrobang of the Regional Trial Court, Branch 22, Imus, Cavite, which is *outside* the jurisdiction of Morong, Rizal. And the offense stated in the search warrant – a mere illegal possession of firearms and ammunition – does *not* present any compelling reasons that would warrant the application therefor in and issuance thereof by a court *outside* the territorial jurisdiction of Morong, Rizal. Thus, the issuance thereof by Judge Mangrobang of Imus, Cavite is a direct violation of Section 2 of Rule 126 of the Rules of Criminal Procedure, thus:

**“Sec. 2. Court where application for search warrant shall be filed. – An application for search warrant shall be filed with the following:**

**(a) Any court within whose territorial jurisdiction a crime was committed.**

**b) For compelling reasons stated in the application, any court within the judicial region where the crime was committed if the place of the commission of the crime is known, or any court within the judicial region where the warrant shall be enforced.” (Emphasis supplied)**

16. Furthermore, if the military and police had the real intention to search and apprehend a certain MARIO CONDES for illegal possession of firearms and ammunition, why would the military and police search a place where such MARIO CONDES is *not* a resident *nor* an occupant thereof. And why did the military and police bring during the illegal search eight (8) 6 x 6 military trucks, two (2) armored personnel carriers, one (1) ambulance, one (1) KIA Pride vehicle, and an undetermined number of PNP vehicles just for the purpose of searching and apprehending one person – a certain MARIO CONDES?

17. The glaring truth is that the military and police really had *no* intention to search and apprehend a certain MARIO CONDES. Their real intention – as can be gathered from the foregoing circumstances – is to harass, illegally search the farmhouse, **plant** pieces of evidence and illegally arrest the participants of the medical training using a patently *unconstitutional* search warrant in order for the search to have a semblance or appearance of legality.

18. At past 8:00 a.m., the forty-three (43) men and women from the medical profession stated hereunder were forcibly taken and removed from the farmhouse by the military and police *without* informing them about the reason for their arrests. They were forcibly placed inside the military vehicles and left the premises.

No one among the persons illegally arrested is the certain MARIO CONDES named in the patently *unconstitutional* search warrant.

19. Dr. Velmonte and her son protested the arrests made on the forty-three (43) individuals but the military and police simply ignored them. Col. Baladad did *not* even bother to state anything about the supposed destination of the forty-three (43) individuals when he was asked by Dr. Velmonte and her son.

20. It was only later that Dr. Velmonte and her son overheard from a soldier that the forty-three (43) individuals were to be brought to **Camp Capinpin in Tanay, Rizal**.

21. The names of the forty-three (43) men and women from the medical profession subject of this petition are as follows:

- (1) Dr. Merry Mia-Clamor, medical doctor
- (2) Dr. Alex Montes, medical doctor
- (3) Gary Liberal, Registered Nurse
- (4) Teresa Quinawayan, Midwife
- (5) Lydia Obera, community health worker
- (6) Reynaldo Macabenta, community health worker
- (7) Angela Doloricon, community health worker
- (8) Delia Ocasla, community health worker
- (9) Janice Javier, community health worker
- (10) Franco Remoroso, community health worker
- (11) Ailene Monasteryo, community health worker
- (12) Pearl Irene Martinez, community health worker
- (13) Elen Carandang, community health worker
- (14) Dany Panero, community health worker
- (15) Rayom Among, community health worker
- (16) Emily Marquez, community health worker
- (17) Emelia Marquez, community health worker
- (18) Jane Balleta, community health worker
- (19) Glenda Murillo, community health worker (pregnant)
- (20) Ace Millena, community health worker
- (21) Ely Castillo, community health worker
- (22) Lalyn Saligumba, community health worker
- (23) Jovy Ortiz, community health worker
- (24) Samsung Castillo, community health worker
- (25) Mark Estrellado, community health worker
- (26) Miann Oseo, community health worker
- (27) Selvia Pajanostan, community health worker
- (28) Lolibeth Donasco, community health worker
- (29) Jenelyn Pizaro, community health worker
- (30) Ramon de la Cruz, community health worker
- (31) Jacqueline Gonzales, community health worker
- (32) Merly Castro, community health worker
- (33) Mercy Castro, community health worker
- (34) Lea de Luna, community health worker
- (35) Judilyn Oliveros, community health worker ( 3 months pregnant)
- (36) Valentino Paulino, community health worker
- (37) Yolanda Yaun, community health worker

- (38) Edwin Dematera, community health worker
- (39) Sherilyn Riocasa Tawagon
- (40) Gerry Sustinto
- (41) Jenmark Barrientos
- (42) Mark Escartin

The name of the other one (1) community health worker completing the list of the forty-three (43) illegally and unconstitutionally arrested individuals cannot be determined with certainty as of the filing of this petition as lawyers are prevented by officials of Camp Capinpin from ascertaining the complete list of the illegally and unconstitutionally arrested men and women from the medical profession. **Nonetheless, said one (1) community health worker is likewise included as a subject of this very urgent petition for *habeas corpus*.**

**22. For purposes of clarity, all forty-three (43) men and women of the medical profession who are presently illegally and unconstitutionally detained and deprived of their liberty by respondents at Camp Capinpin in Tanay, Rizal – whether the foregoing names are the exact names or not of said persons – are the subject of this very urgent petition for *habeas corpus*.**

23. The illegal and unconstitutional search within the farmhouse continued even after the foregoing individuals were already illegally and forcibly taken into custody. The occupants of the farmhouse that were left in the premises but were still confined in one corner thereof were Dr. Velmonte, her son Jose Manuel, and two (2) family helpers. Still, the continued illegal and unconstitutional search of the whole premises was conducted *without* the presence of Dr. Velmonte and other lawful occupants thereof.

24. Dr. Velmonte was later told by the military and police about their *ridiculous* and *absurd* claim that grenades and landmine were allegedly recovered from one of the beds within the premises. The same were definitely and without an iota of doubt “planted” by the military and police when they illegally and unconstitutionally searched the premises *without* the presence of any lawful occupant thereof to stand as

witness during the actual search. *Who in the right mind would keep grenades and landmine on a bed? And what would medical practitioners do with grenades and landmine?*

25. In the following article entitled “*Doctor’s home in Rizal raided; 43 alleged Reds nabbed*” that appeared in *inquirer.net* on February 6, 2010 at 4:45 p.m., Col. Baladad made the *ridiculous* and *absurd* claims that the forty-three (43) men and women of the medical profession are suspected communist rebels and that the following were allegedly found in the premises of the farmhouse, thus:

- (a) .45-caliber pistol
- (b) .38-caliber revolver
- (c) three (3) grenades
- (d) a landmine
- (e) a claymore mine
- (f) two (2) kilos of ammonium nitrate
- (g) seven (7) blasting caps
- (h) 36 improvised explosive sticks, and
- (i) campaign materials of the party-list Bayan Muna

“Doctor’s home in Rizal raided; 43 alleged Reds nabbed  
By Maricar Cinco  
Inquirer Southern Luzon  
First Posted 16:45:00 02/06/2010

Filed Under: [Armed conflict](#), [Guerrilla activities](#), [Health](#)

CAMP VICENTE LIM, Laguna, Philippines—Security forces raided a doctor’s home in Morong, Rizal on Saturday and arrested 43 alleged New People’s Army rebels the military claims were undergoing training in the making of improvised explosive devices.

But Dr. Melecia Velmonte, owner of the house and a training facility inside the compound, said the people taken in by the team of soldiers and policemen were members of a non-governmental organization training in community health.

In a phone interview, Colonel Aurelio Baladad, commander of the 202nd Infantry Brigade of the Philippine Army based in Tanay, Rizal, said the people arrested during the raid were suspected communist rebels.

Baladad claimed the alleged rebels, 26 of whom were female, were known figures of the communist movement from the national down to the provincial commands.

A .45-caliber pistol, a .38-caliber revolver, three grenades, a landmine, a claymore mine, two kilos of ammonium nitrate, seven blasting caps, 36 improvised explosive sticks and campaign materials of the party-list Bayan Muna were recovered, he said.

But Dr. Velmonte, a consultant at the Philippine General Hospital, claimed her guests were members of a non-government organization called the Community for Health Development, which sought her help in using the training facility.

"I agreed because it's an advocacy. They wanted to help people in the remote areas," she said.

The health training, Velmonte said, started on February 1 and was supposed to end Sunday.

"They were so many. I saw four six-by-six trucks, a military tank and two police mobiles," said Velmonte of the military and police force that raided her home at around 6:30 a.m.

She said her helper was held at gunpoint to open the gate for the soldiers, who also claimed to have a warrant to search her property.

"But when I asked for the warrant they could not show any," she said.

The men also allegedly entered her property without explaining to her what the operation was for.

"They said they recovered a grenade and a land mine from one of the beds of the participants," Velmonte said, adding she suspected the materials were planted when the soldiers searched the rooms without any civilian to stand as witness.

"Common sense! Who would keep grenades in places where someone sleeps?" she said.

But Baladad said the operation was "legitimate" based on the search warrant they secured from a court."

26. The foregoing claims of Col. Baladad are indeed *outrageous* and *unbelievable*. It is indeed very *convenient* for Col. Baladad to make such *preposterous* claim that the foregoing materials were allegedly found in the premises of the farmhouse because the military and police did *not* allow any lawful occupants thereof to be actually present and stand as witness during the illegal search of the premises.

27. The inclusion of "campaign materials of the party-list Bayan Muna" in the said list of materials allegedly found in the premises was obviously made by Col. Baladad apparently to discredit Bayan Muna party-list for the forthcoming May 10, 2010 elections.

28. Indeed, the *outrageous*, *unbelievable* and *absurd* claims of Col. Baladad are even made more clear and evident by the fact that Atty. Ephraim Cortez – the lawyer engaged by petitioner Community Medicine Development Foundation (COMMED)

and by the families of some of the subjects of this petition to confer with the forty-three (43) individuals – together with the subjects’ colleagues Dr. Edelina Dela Paz and Dr. Geneve E. Rivera, petitioners Roneo S. Clamor and Atty. Raymundo L. Apuhin, and human rights defender Olivia Bernardo, were *prevented* and *not* allowed entry by respondents inside Camp Capinpin in Tanay, Rizal when they went to said military camp on the afternoon of February 6, 2010, hours after the illegal and unconstitutional search and arrests.

29. The forty-three (43) individuals subject of this petition have been continuously deprived by respondents of their right to counsel and are continued to be held *incommunicado* inside Camp Capinpin in Tanay, Rizal. Twice did lawyers, doctors, relatives and human rights defenders try to enter Camp Capinpin to visit and confer privately with said forty-three (43) individuals – on February 6 and 7, 2010, while Commission on Human Rights (CHR) chair Leila De Lima did try to enter the camp on February 7, 2010 but to no avail – and twice did respondents not allowed their entry.

30. It was only on February 8, 2010 that relatives-petitioners of some of the subjects of this petition and CHR chair De Lima were allowed entry inside the camp to visit and confer with *some* of the illegally arrested individuals. **Only the subjects of this petition who had relatives as visitors were presented, and those subjects who had no relatives as visitors were never presented.**

31. It was during this meeting between the relatives-petitioners and some of the subjects of this petition that the latter disclosed to the former that they were forcibly interrogated, subjected to mental torture and purposely deprived of any sleep since the time that they were illegally and unconstitutionally arrested. In fact, subject Dr. Alexis Montes, when visited by his brother-petitioner Roy S. Montes on February 8, 2010, disclosed to the latter that he was electrocuted by his interrogators.

32. All the forty-three (43) men and women of the medical profession subject of this petition are presently detained and illegally and unconstitutionally deprived of their liberty by respondents at Camp Capinpin in Tanay, Rizal *without* any lawful cause and in utter disregard and violation of their constitutional rights.

33. The following respondents are the ones responsible for the illegal arrests and continued illegal and unconstitutional detention of said forty-three (43) men and women of the medical profession at Camp Capinpin in Tanay, Rizal, thus:

(a) Brig. Gen. Jorge Segovia, chief of the 2<sup>nd</sup> Infantry Division of Philippine Army and the over-all commander of Camp Capinpin in Tanay, Rizal;

(b) Col. Aurelio Baladad, commander of the 202<sup>nd</sup> Infantry Brigade of the Philippine Army in Camp Capinpin, Tanay, Rizal; and

(c) P/Supt, Marion Balonglong, head of the Rizal Provincial Philippine National Police.

34. The following respondents exercise command responsibility over the unlawful acts of the foregoing named respondents – and over the foregoing named respondents themselves – in the illegal and unconstitutional search, arrests and detention of the subjects of this petition, thus:

(a) Gen Victor S. Ibrado, Armed Forces of the Philippines Chief of Staff;

(b) Lt. Gen. Delfin N. Bangit, Commanding General of the Philippine Army; and

(c) Philippine National Police Director General Jesus A. Verzosa.

35. In view of the urgent circumstances of this petition, and to avoid any further utter disregard and violation of the constitutional rights of said forty-three (43) men and women of the medical profession, petitioners most humbly pray that a writ of *habeas*

*corpus* be issued and granted commanding the respondents to have the body of all forty-three (43) individuals before the Honorable Court at the earliest possible time.

### **PRAYER**

**WHEREFORE**, in view of the foregoing, petitioners most respectfully pray of the Honorable Court the following:

1. That this petition be given due course;
2. That a *writ* of habeas corpus be issued and granted commanding the respondents to take and have the body of all forty-three (43) men and women of the medical profession presently illegally and unconstitutionally detained at Camp Capinpin in Tanay, Rizal before the Honorable Court at the earliest possible time; and
3. That after the body of all forty-three (43) men and women of the medical profession have been produced before the Honorable Court, a *privilege* of the writ of *habeas corpus* be issued and granted immediately ordering the release of said persons from Camp Capinpin in Tanay, Rizal.

Petitioners likewise pray for such other reliefs as are just and equitable under the circumstances.

**RESPECTFULLY SUBMITTED.** Quezon City for Manila, 07 February 2010.

**National Union of Peoples' Lawyers**

By:

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Copy furnished: *Through Registered Mail*

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**COMMANDING GENERAL**  
**PHILIPPINE ARMY**  
Fort Andres Bonifacio, Metro Manila

**BRIG. GEN. JORGE SEGOVIA**  
**CHIEF**  
**2<sup>ND</sup> INFANTRY DIVISION**  
**PHILIPPINE ARMY**  
Camp Capinpin, Tanay, Rizal

**COL. AURELIO BALADAD,**  
**COMMANDER**  
**202<sup>ND</sup> INFANTRY BRIGADE**  
**PHILIPPINE ARMY**  
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Rizal Provincial PNP

**SOLICITOR GENERAL**  
**OFFICE OF THE SOLICITOR GENERAL**  
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Legaspi Village, Makati City

**EXPLANATION FOR SERVICE OF PETITION  
THROUGH REGISTERED MAIL**

The service of copies of the instant Petition is done through registered mail. Pursuant to Rule 13, Section 11 of the Rules of Court, the service of copies of the instant Petition cannot be done personally due to distance and lack of available personnel.

**JULIUS GARCIA MATIBAG**