

Republic of the Philippines  
**COMMISSION ON HUMAN RIGHTS**  
Quezon City

**GREENPEACE SOUTHEAST ASIA (PHILIPPINES), PHILIPPINE RURAL RECONSTRUCTION MOVEMENT, SENTRO NG MGA NAGKAKAISA AT MANGGAGAWA, PHILIPPINE ALLIANCE OF HUMAN RIGHTS ADVOCATES, PHILIPPINE HUMAN RIGHTS INFORMATION CENTER, MOTHER EARTH FOUNDATION, ECOWASTE COALITION 350.ORG EAST ASIA, NAGKAKAISANG UGNAYAN NG MGA MAGSASAKA AT MANGGAGAWA SA NIYUGAN, ASIAN PEOPLES' MOVEMENT ON DEBT & DEVELOPMENT, ALLIANCE OF YOUTH ORGANIZATIONS AND STUDENTS-BICOL, PHILIPPINE MOVEMENT FOR CLIMATE JUSTICE, NUCLEAR FREE BATAAN MOVEMENT, VON HERNANDEZ, FR. EDWIN GARIGUEZ, NADEREV "YEB" SAÑO, AMADO GUERRERO SAÑO, CARLOS CELDRAN ANGEL AQUINO, JUAN MANUEL "KOKOI" BALDO, LIDY NACPIL, BENJAMIN ACERON, ELMA REYES, LAIDY REMANDO, RICHARD LOPEZ, CONSTANCIA LOPEZ, LERISSA LIBAO, GLORIA CADIZ, TARCILA M. LERUM, ROY N. BASTO VERONICA V. CABE,**

**Case No.: CHR-NI-2016-0001**

*Petition Requesting for Investigation of the Responsibility of the Carbon Majors for Human Rights Violations or Threats of Violations Resulting from the Impacts of Climate Change*

*Petitioners,*



CHEVRON (US), EXXON MOBIL (US), BP (UK), ROYAL DUTCH SHELL (NL), CONOCO PHILLIPS (US), PEABODY ENERGY (US), TOTAL (FR), CONSOL ENERGY (US), BHP BILLITON (AU), ANGLO AMERICAN (UK), RWE (DE), ENI (IT), RIO TINTO (UK), ARCH COAL (US), ANADARKO (US), OCCIDENTAL (US), LUKOIL (RU), ROSNEFT (RU), SASOL (ZA), REPSOL (ES), MARATHON (US), HESS (US), GLENCORE (CH), ALPHA NATURAL RESOURCES (US), FREEPORT MCMORAN (US), ENCANA (CA), DEVON ENERGY (US), BG GROUP (UK), WESTMORELAND MINING (US), SUNCOR (CA), KIEWIT MINING (US), NORTH AMERICAN COAL (US), RAG, (DE), LUMINANT (US), LAFARGE (FR), HOLCIM (CH), CANADIAN NATURAL RESOURCES (CA), APACHE (US), MURRAY COAL (US), UK COAL (UK), HUSKY ENERGY (CA), HEIDELBERGCEMENT (DE), CEMEX (MX), ITALCEMENTI (IT), MURPHY OIL (US), TAIHEIYO (JP), OMV GROUP (AT).

*Respondents.*

X-----X

**MOTION FOR EXTENSION OF TIME  
EX ABUNDANTI AD CAUTELAM  
(to file a response to the Petition dated 9 May 2016)**

Respondent **TAIHEIYO CEMENT CORPORATION** (hereinafter "Respondent TCC") through undersigned counsel, by way of special appearance, most respectfully avers:

1. On 04 August 2016 Respondent TCC received an Order dated 21 July 2016 (hereinafter the "Order") issued by the Honorable Commission on Human Rights of the Philippines (hereinafter "CHR") through private courier - DHL



2. The Order directs the named Respondents to submit their Comment or Answer to the Petition filed by Greenpeace Southeast Asia (Philippines), et al. (hereinafter the "Greenpeace Petition") within forty-five (45) days from receipt of the Greenpeace Petition.
3. With express reservation on the matter of jurisdiction, and without necessarily admitting the allegations in the Greenpeace Petition, the undersigned counsel respectfully manifests that it requires more time to prepare the appropriate response to the Greenpeace Petition and to secure the authenticated authorizations from Japan for the said response.
4. Respondent TCC, through undersigned counsel, most respectfully begs the indulgence of the Honorable Commission and requests that it be granted an additional period of twenty (20) days or until 10 October 2016 (8 October, 2016 being a Saturday) within which time to file its response to the Greenpeace Petition.
5. This motion is not intended for delay but is filed in good faith and only for the purposes stated herein.

### **PRAYER**

WHEREFORE, premises considered, Respondent TCC most respectfully prays that the Honorable Commission grant it an additional twenty (20) days or until 10 October 2016 (8 October, 2016 being a Saturday) to file its Response to the Greenpeace Petition

Respondent TCC likewise prays for such other remedies as may be just and equitable under the circumstances.

RESPECTFULLY SUBMITTED.

Makati City for Quezon City, 19 September 2016.

**COCHINGYAN & PERALTA LAW OFFICES**  
*Counsel for Respondent Taiheiyō Cement Corporation*

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139 Valero Street, Salcedo Village,  
Makati City, Metro Manila  
Tel. No. +632 8173081 to 83

By:



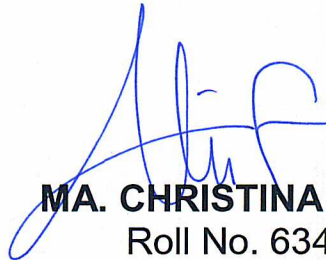
**AIMEE ABIGAIL E. SALAMAT**

Roll of Attorney No. 58432

PTR No. 5330490/ January 11, 2016/ Makati City

IBP No. 1023417/ January 8, 2016/ Quezon

MCLE Compliance No. V-0020707/ April 20, 2016/  
Pasig City



**MA. CHRISTINA REYES**

Roll No. 63407

PTR No. 5330491/January 11, 2016/Makati City

IBP No. 1023415/January 08, 2016/ Makati City

MCLE Compliance No. V-0012366/December 08,  
2015/Pasig City

**NOTICE OF HEARING**

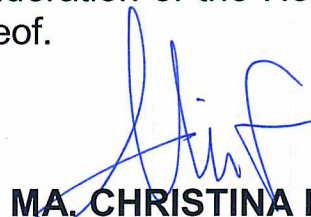
**GREENPEACE SOUTHEAST ASIA (PHILIPPINES)**

*Petitioners*

No. 30 JGS Bldg., Sct. Tuason,  
Brgy. Laging Handa, Quezon City

**GREETINGS:**

Please take notice that the undersigned will submit the foregoing Motion for the consideration of the Honorable Commission immediately upon receipt thereof.



**MA. CHRISTINA REYES**

Copy Furnished:

**GREENPEACE SOUTHEAST ASIA (PHILIPPINES)**

*Petitioners*

No. 30 JGS Bldg., Sct. Tuason,



## EXPLANATION

A copy of this Motion was served on the Petitioners through registered mail due to time constraint and considerable distance between the office address of the undersigned and those of the Petitioners and Respondents.



**MA. CHRISTINA REYES**