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Republic of the Philippines
National Capital Judicial Region
REGIONAL TRIAL COURT
Branch 147
City of Makati

Juana Dela Cruz, et. al
Plaintiffs,

-versus-

Civil Case No. 15-123
For: Partition

Petra Dela Cruz, et. Al
Defendants.

X-----X

ANSWER WITH COUNTERCLAIM

(To the Complaint dated 29 July 2015)

Defendant Petra dela Cruz ("Pedro" or "Defendant" for brevity), by counsel, and unto this Honorable Court, most respectfully states - THAT:

1.0 On 03 September 2015, Petra received a summons from this Honorable Court requiring her to file an Answer within fifteen (15) days after service or until 18 September 2015. However, due to financial constraint, Defendant was not able to timely secure the services of counsel to represent her in the instant case.

1.1 It was only on September 30, 2015, when the services of the undersigned counsel was engaged. Forthwith, this representation carefully evaluated the Complaint and all related documents necessary to draft an intelligent Answer. However, it, still, took him more than three (3) days to complete this Answer.

1.2 Thus, Petra, through a Motion to Admit Answer, to which this pleading is attached, prays for the admission of this Answer in the interest of substantial justice.

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William W. Schwarzer



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