

REPUBLIC OF THE PHILIPPINES
REGIONAL TRIAL COURT
THIRD JUDICIAL REGION
BRANCH 72
OLONGAPO CITY

MY CYBERSTAFF, INC.
herein represented by its
PRESIDENT, MURTO NEL,
Plaintiff,

-versus-

S.E.C. CASE NO. 15-003

ROY LEONARD ANDERSON
AND PERSONS ACTING ON
BEHALF OF MY CYBERSTAFF, INC.
WITHOUT AUTHORITY,
Defendants.

x-----x

FORMAL OFFER OF EVIDENCE

PLAINTIFF, through the undersigned counsel, unto the Honorable Court, most respectfully files this FORMAL OFFER OF EVIDENCE for marking and admission of the following:

EXHIBIT "A" - MCS BOARD RESOLUTION NO. 40

- To prove that Murto Nel is authorized to file a case against the Defendants and to represent, sign for and in behalf of the Plaintiff.

EXHIBIT "B" TO "B-16" - CERTIFICATE OF INCORPORATION OF MY CYBERSTAFF, INC.

- To prove that My Cyberstaff, Inc. is a corporation duly existing and registered under Philippine Laws.

EXHIBIT "C" - BOARD RESOLUTION NO. 2, SERIES OF 2014

- To prove that MURTO NEL is the President of My Cyberstaff, Inc.

EXHIBIT "D" - STOCK PURCHASE AGREEMENT DATED DECEMBER 15, 2014

- To prove that Bastiaan Johannes Arnoldus Derksen was the owner of 6,500 shares from My Cyberstaff, Inc. (MCS) and that he has validly purchased the said shares from the corporation.

EXHIBIT "E" - STOCK PURCHASE AGREEMENT DATED JANUARY 6, 2015

- To prove that Murto Nel purchased the 250 shares in MCS of Gregory Ian Anderson.

EXHIBIT "F" - STOCK PURCHASE AGREEMENT DATED JAN. 6, 2015

- To prove that Murto Nel purchased the 250 shares in MCS of Peiling Xiong.

EXHIBIT "G" - LETTER DATED MAY 19, 2015 from TARA ENERGY, LLC

- To prove that the Defendant, Roy Anderson, has committed acts which are inimical and detrimental to MCS.

EXHIBIT "H" - BOARD RESOLUTION NO. 27

- To prove that the Plaintiff has already dismissed the Defendant as its Chief Financial Officer.

EXHIBIT "I" - LETTER DATED MAY 19, 2015 Anglo Asian Commodities Corp.

- To prove that the Defendant has been unlawfully interfering with the business of the Plaintiff and has unilaterally revoked the contract of lease of the Plaintiff with Anglo Asian Commodities Corp. without a proper Board Resolution.

**EXHIBIT "J" - SECURITIES AND EXCHANGE COMMISSION
GENERAL INFORMATION SHEET OF MY
CYBERSTAFF, INC.**

- To prove that the Plaintiff is an existing corporation under Philippine Laws.

EXHIBIT "K" - LETTER DATED AUGUST 19, 2015

- To prove that the Defendant has been unlawfully interfering with the business of the Plaintiff and is illegally representing himself to be the President of MCS.

**EXHIBIT "L" - LEGAL NOTICE IN MCS WEBSITE DATED
AUGUST 22, 2015**

- To prove that the Defendant has usurped the website of the Plaintiff as well as the telephone numbers, electronic mail addresses and other intellectual property of the Plaintiff.

**EXHIBIT "M" to "M-3"- EXTRACT FROM POLICE BLOTTER
DATED AUGUST 22, 2015**

- To prove that the Plaintiff exhausted all remedies to prevent the Defendant from stealing the property of the Plaintiff, but to no avail.

EXHIBIT "N" - AFFIDAVIT IN SUPPORT OF THE

**ISSUANCE OF THE EX PARTE TEMPORARY
RESTRAINING ORDER AND WRIT OF
PRELIMINARY INJUNCTION**

- To prove the facts necessary for the issuance of a Writ of Preliminary Injunction and/or Temporary Restraining Order.

EXHIBIT "O" - JUDICIAL AFFIDAVIT OF MURTO NEL

- To serve as his direct examination testimony.

EXHIBIT "P" - STOCK AND TRANSFER BOOK

- To prove the current stock ownership of My Cyberstaff, Inc.

**EXHIBIT "Q" to "Q-1" - STOCK CERTIFICATE OF
BASTIAAN JOHANNES
ARNOLDUS DERKSEN**

- To prove his ownership of shares in MCS.

**EXHIBIT "R" to "R"-3" - STOCK CERTIFICATE
OF MURTO NEL**

- To prove his ownership of shares in MCS.

**EXHIBIT "S" - STOCK CERTIFICATE OF LAURA JANE
NEL**

- To prove her ownership of shares in MCS.

**EXHIBIT "T" - STOCK CERTIFICATE OF SALVACION T.
VILLALOBOS**

- To prove her ownership of shares in MCS.

EXHIBIT "U" - STOCK CERTIFICATE OF CORNELIS RONALD BOSMAN

- To prove his ownership of shares in MCS.

EXHIBIT "V" - STOCK CERTIFICATE OF ROY LEONARD ANDERSON

- To prove his ownership of shares in MCS.

EXHIBIT "W" - GENERAL INFORMATION SHEET

- To prove the ownership of shares in MCS.

EXHIBIT "X" TO "X-7" - BPI FOREIGN CURRENCY SAVINGS PASSBOOK

- To prove that Bastiaan Derksen deposited the amount of Php1,000,000.00 to the account of MCS as payment for his 6,500 shares.

EXHIBIT "Y" to "Y-1" - DOCUMENTARY STAMP TAX RETURN and LAND BANK OF THE PHILIPPINES BIR TAX PAYMENT DEPOSIT SLIP

- To prove the payment of taxes as regards the shares of Bastiaan Derksen.

With the submission and the admission of the above evidence together with the oral testimony of plaintiff, the plaintiff rests its case.

Olongapo City, 28 September 2015.

RESPECTFULLY SUBMITTED.

~~MINISTER MOISES D. DU~~

Counsel for the Plaintiff

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Copy furnished: (private courier)
(Explanation: By reason of distance and lack of manpower)

ATTY. BART DALANGIN
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San Felipe, Zambales

LBC Tracking No.
Date: 29 Sept. 2015