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SECURITIES AND EXCHANGE COMMISSION

SEC Building, EDSA, Greenhills, Mandafuyong City, Metro Manila, Philippines
Tel: (632) 726-0931 to 39 Fax: (632) 725-5293 Email: mis@sec.gov.ph

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**PICAZO BUYCO TAN FIDER & SANTOS
LAW OFFICES**

Antonio A. Picazo
Silverio Benny J. Tan
Purissimo S. Buyco
Alex Erlito S. Fider
Gemma M. Santos
Gabriel A. Dee
Cynthia Y. Ligeralde-de la Paz
Ma. Adelina S. Gatdula
Estrelita G. Gacutan
Luis Manuel L. Gatmaitan
Carlo Magno J. Verzo
Jonas-Karl V. Perez
Daphne T. Jereza
Peter Donnely A. Barot
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Grace G. dela Cruz
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Recaredo C. Borbonia, Jr.
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Paul T. Salanga
Cherrylyn G. Prado-Caoile

Robel C. Lomibao
Daniel Winston C. Tan-chi

Elon Cris C. Culangen
Lyne L. Arnaldo-Vega
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Ma. Lourdes Gaye T. Calpo
Antonio Esteban G. Conejos
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Jordan Neil S. Pugeda
Frances Lynette V. Sayson
Leighna Katrina S. Sitoy
Jasmine L. Solivas
Mark M. Tiaoqui
Diana Cecilia E. Triviño
Joseph Dy Valera, Jr.
Michael Angelo A. Villamor

18th, 19th & 17th Floors, Liberty Center
104 H.V. de la Costa Street
Salcedo Village, Makati City
Metro Manila, Philippines 1227

Website: <http://www.picazolaw.com>

2 August 2010

Trunkline: (632) 888-0999

SECURITIES AND EXCHANGE COMMISSION
SEC Building, EDSA, Greenhills,
Mandaluyong City, Metro Manila

Facsimile: 18F (632) 888-1011
19F (632) 888-1012
(632) 844-6169
17F (632) 844-6167

Attention: **Atty. Justina F. Callangan**
Corporation Finance Department Director

E-mail: picazolaw@eastern.com.ph
main@picazolaw.com

Re: Response to Letter of the Corporation Finance
Department - Securities and Exchange Commission

P.O. Box No. 2153 MCPO

Gentlemen:

On behalf of our client, LIM Advisors Limited (the "Company"), we write in response to your letter dated 19 July 2010, which we received on 30 July 2010, directing the Company to submit an amended SEC Form 23-B to disclose the transaction date in the SEC Form 23-B we filed on behalf of the Company on 7 July 2010 with respect to the Company's shareholdings in Fil-Estate Land, Inc. ("FELI").

We submit herewith a copy of Amended SEC Form 23-B which now reflects the transaction date of 4 June 2010 (the "Transaction Date") for the Company's acquisition of the right to acquire 386,133,333 additional underlying shares for the FELI bonds held beneficially by the Company which are convertible into shares of FELI (the "FELI Convertible Bonds"). The Transaction Date was the date when the Company received official notice from FELI of the filing by FELI of SEC Form 10.1 (Notice of Exempt Transaction) with the Commission in respect of the additional underlying shares for the FELI Convertible Bonds.

We trust you will find the attached Amended SEC Form 23-B to be in order. We undertake to submit the original signed Amended SEC Form 23-B as soon as we receive the same from the Company.

Very truly yours,


ESTRELITA G. GACUTAN

FORM 23-B

SECURITIES AND EXCHANGE COMMISSION
Metro Manila, Philippines

STATEMENT OF CHANGES IN BENEFICIAL OWNERSHIP OF SECURITIES

Filed pursuant to Section 23 of the Securities Regulation Code

Check box if no longer subject to filing requirement

1. Name and Address of Reporting Person
LIM Advisors Limited (Previously known as Long Investment Management Ltd)
(Type)

2. Issuer Name and Trading Symbol
FF-Estate Land, Inc.
3. Securities to Report (Year)

4. Class of Equity Security
Common shares*

5. Acquisition Date (Month/Day/Year)
6/4/2010

6. Ownership (Give the below)
Other (Specify below)

7. Relationship or Reporting Person to Issuer (Check all applicable)
Director — 10% Owner — Other (Specify below) —

8. Amount of Securities Beneficially Owned at end of Month
1,344,400.083*

9. Percentage Held
28.95%

10. Ownership Form
Indirect

11. Nature of Interest (Beneficial Ownership)
With investment and voting power

12. Transaction Date (Month/Day/Year)
6/4/2010

13. Securities Acquired (A) or Disposed of (D)
A

14. Amount (A) or (D)
386,133,933

15. Price
1.00

16. Acquisition Date (Month/Day/Year)
NA

17. Acquisition Date or Original (Month/Year)
June-10

18. Issuer Name
Hong Kong

19. Class of Equity Security
Common shares*

20. Amount (A) or (D)
1,344,400.083*

21. Percentage Held
28.95%

22. Ownership Form
Indirect

23. Nature of Interest (Beneficial Ownership)
With investment and voting power

* Consists of 50,000,000 issued and outstanding shares, 136,000,000 warrants and 1,158,400,083 underlying shares for the convertible bonds

Remember: Report on a separate line for each class of equity securities beneficially owned directly or indirectly.

(Print or Type Responses)

(1) A person is directly or indirectly the beneficial owner of any equity security with respect to which he has or shares:
 (A) voting power which includes the power to vote, or to direct the voting of, such security; or
 (B) investment power which includes the power to dispose of, or to direct the disposition of, such security.
 (2) A person will be deemed to have indirect beneficial ownership in any equity security which he:
 (A) holds by means of a trust; or
 (B) holds by means of a custodian, nominee, or other person acting on his behalf; or
 (C) holds by a partnership in which such person is a general partner;
 (3) subject to any contract, arrangement or understanding which gives such person voting power or investment power with respect to such security.

| A. Name and Address of Issuer (Do not include cash, notes, receivables, or similar instruments) | B. Description of Derivative Security | C. Conversion or Exercise Price of Derivative Security | D. Conversion or Exercise Date | E. Notional Amount of Derivative (in \$) | | F. Full or Partial Exercise of Derivative Security | G. Full or Partial Exercise of Derivative Security | H. Full or Partial Exercise of Derivative Security | I. Full or Partial Exercise of Derivative Security | J. Full or Partial Exercise of Derivative Security | K. Full or Partial Exercise of Derivative Security | L. Full or Partial Exercise of Derivative Security |
|---|---------------------------------------|--|--------------------------------|--|----------------------------|--|--|--|--|--|--|--|
| | | | | At End of Reporting Period | At End of Reporting Period | | | | | | | |
| Convertible Bonds (F1) Estate CB 2012A) | 193,066,666 shares at \$1.00/share | | | | | | | 579,200,042 | | | | With investment and voting power |
| Convertible Bonds (F1) Estate CB 2012B) | 193,066,667 shares at \$1.00/share | | | | | | | 579,200,042 | | | | With investment and voting power |
| Warrants | | | | | | | | 138,000,000 | | | | With investment and voting power |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |
| | | | | | | | | | | | | |

[Signature]
 Date: 2 August 2010

There are no changes to the beneficial ownership of the derivative securities from the last report made.

Note: Full and partial exercise of the term date of which must be manually signed by the reporting person. If there is any change of beneficial ownership of the derivative securities from the last report made, the reporting person must sign in block of the reporting period. After acquiring assets, please provide a receipt.