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BY HAND

24 October 2016

EXECUTIVE DIRECTOR JOSE M. TOLENTINO, JR.
Office of the Executive Director
Commission on Elections
Palacio Del Gobernador
General Luna St.
Intramuros, Manila

Re: Protestant Marcos' Urgent Manifestation and Motion

Dear Executive Director Tolentino:

Please be informed that we filed last Friday, 21 October 2016, with the Presidential Electoral Tribunal ("PET") Protestant Marcos' Urgent Manifestation and Motion regarding the COMELEC's plan to release the one thousand three hundred fifty-six (1,356) contingency units of the vote counting machines ("VCM") to Smartmatic-TIM (Refs.: Commissioner Christian Robert S. Lim's letter to Honorable Maria Lourdes P.A. Sereno dated 27 September 2016; Executive Director Jose M. Tolentino, Jr.'s letter to Atty. George Garcia dated 10 October 2016; and the proceedings conducted last 19 October 2016 at the COMELEC's Training Room in Sta. Rosa City, Laguna).

We reiterate our objection to the release of the aforesaid VCMs.

Very truly yours,
FOR THE FIRM


JOSE AMOR M. AMORADO

Cc: Chairman Andres D. Bautista
Commissioner Christian Robert S. Lim
Commissioner Al A. Parreño
Commissioner Luie Tito F. Guia
Commissioner Arthur D. Lim
Commissioner Ma. Rowena Amelia V. Guanzon



Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

FERDINAND "BONGBONG" R. MARCOS, JR.,

Protestant,



-versus-

MARIA LEONOR "LENI DAANG MATUWID" G. ROBREDO,

Protestee.

X-----X

PET Case No. 005

For: Election Protest

Vice-President



URGENT MANIFESTATION AND MOTION

1. On 12 July 2016, this Honorable Tribunal adopted a *Resolution* granting the prayer of protestant Marcos for a Precautionary Protection Order ("PPO") directed to the Commission on Elections ("COMELEC"), which reads as follows:

"NOW, THEREFORE, pursuant to Rule 36 of the 2010 Rules of the Presidential Electoral Tribunal, You, the Commission on Elections, your agents, representatives, or persons acting in your place or stead, including the city/municipal treasurers, election officers, and the responsible personnel and custodians, are hereby **DIRECTED** to **PRESERVE** and **SAFEGUARD** the integrity of all the ballot boxes and their contents, including the ballots, voter's receipts and election returns; the lists of voters particularly the Election Day Computerized Voter's List (EDCVL), and voters registration records (VRRs), and the books of voters; the audit logs, transmission logs, and all log files; and all other documents or paraphernalia used in the May 2016 elections for the position of Vice-President of the Republic of the Philippines, including the automated election equipment records such as the Vote Counting Machines (VCM), Consolidation and Canvass System (CCS) units, Secure Digital (SD) cards (main and back-up), and the other data storage devices in all of the ninety-two

