

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

**FERDINAND "BONGBONG" R.
MARCOS, JR.,**

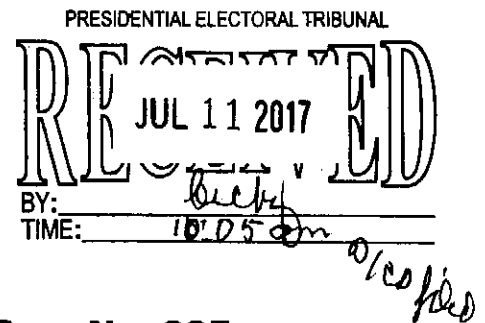
Protestant,

-versus-

**MARIA LEONOR "LENI DAANG
MATUWID" G. ROBREDO,**

Protestee.

X - - - - - X



PET Case No. 005
For: Election Protest
Vice-President

MANIFESTATION and COMPLIANCE
with REITERATIVE MOTION TO
DIRECT THE COLLECTION OF BALLOT
BOXES AND OTHER ELECTION
DOCUMENTS AND PARAPHERNALIA
FOR THE PILOT PROTEST

Protestant **FERDINAND "BONGBONG" R. MARCOS, JR.**
("protestant Marcos"), through the undersigned counsel, unto this
Honorable Presidential Electoral Tribunal ("PET"), most respectfully
states that:

1. On **21 March 2017**, this Honorable Tribunal issued a
Resolution directing protestant Marcos to pay the cash deposit for
this election protest in the amount of *Sixty Six Million Two Hundred
Twenty Three Thousand Pesos (Php66,223,000.00)* in two (2)
tranches, the first installment in the amount of *Thirty Six Million
Twenty Three Thousand Pesos (Php36,023,000.00)* to be paid on
or before **14 April 2017** and the remaining balance to be paid on or
before **14 July 2017**.

2. In compliance thereto, protestant Marcos initially deposited
the amount of **Php36,023,000.00** on **17 April 2017** before the
Cash Collection and Disbursement Division of this Honorable Tribunal.

3. As for the final installment of the cash deposit in the amount of *Thirty Million Two Hundred Pesos (Php30,000,200.00)*, protestant Marcos hereby informs this Honorable Tribunal that he already paid the aforesaid sum in the form of BDO manager's check with Check Nos. 0021056 and 0002263 on **10 July 2017**. Machined copies of the manager's check and **Official Receipt No. 7424405 B**, which was issued by the Cash Collection and Disbursement Division of this Honorable Tribunal, are herewith attached as **Annexes "A", "A-1" and "B"**.

4. With the full payment of the cash deposit for this election protest, it is respectfully submitted by protestant Marcos that this Honorable Tribunal should now **DIRECT** the immediate **COLLECTION, RETRIEVAL, TRANSPORT** and **DELIVERY** of **ALL** the (a) ballot boxes and their contents, including the ballots, voter's receipts and election returns; (b) the lists of voters, particularly the Election Day Computerized Voter's List (EDCVL), and voters registration records (VRRs), and the books of voters; (c) the audit logs, transmission logs, and all log files; and (d) all other documents or paraphernalia used in the elections, including the automated election equipment and records such as the Vote Counting Machines (VCM), Consolidation and Canvass System (CCS) units, Secure Digital (SD) cards (main and back up), and other data storage devices containing electronic and ballot images, evidencing the conduct and the results of the elections in **ALL** of the protested clustered precincts of the provinces of **BASILAN, LANA O DEL SUR, MAGUINDANAO, CAMARINES SUR, ILOILO** and **NEGROS ORIENTAL** pursuant to **Rule 37** of the **2010 PET Rules**.

P R A Y E R

ACCORDINGLY, it is most respectfully prayed of this Honorable Tribunal to **DIRECT** the immediate **COLLECTION, RETRIEVAL, TRANSPORT** and **DELIVERY** of **ALL** the (a) ballot boxes and their contents, including the ballots, voter's receipts and election returns; (b) the lists of voters, particularly the Election Day Computerized Voter's List (EDCVL), and voters registration records (VRRs), and the books of voters; (c) the audit logs, transmission logs, and all log files; and (d) all other documents or paraphernalia used in the elections, including the automated election equipment and records such as the Vote Counting Machines (VCM), Consolidation and Canvass System (CCS) units, Secure Digital (SD) cards (main and back up), and other data storage devices containing electronic and

ballot images, evidencing the conduct and the results of the elections in **ALL** of the protested clustered precincts of the provinces of **BASILAN, LANA DEL SUR, MAGUINDANAO, CAMARINES SUR, ILOILO** and **NEGROS ORIENTAL** and to duly **NOTE** the **full payment of the cash deposit** by the protestant.

OTHER RELIEFS, just and equitable under the premises, are likewise prayed for.

City of Manila, Philippines, **10 July 2017.**

G.E. GARCIA LAW OFFICE

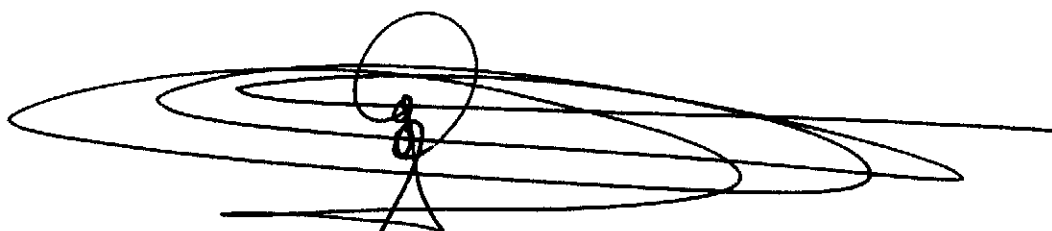
Lead Counsel for the Protestant

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By:



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IBP Lifetime No. 02652; Cavite Chapter

MCLE Compliance No. V- 0011708; 11-09-15



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MCLE Compliance No. V-0012772; 12-15-2015

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(Formerly: Marcos Ochoa Serapio & Tan Law Firm)

Collaborating Counsel for the Protestant

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IBP Lifetime Member No. 00054; Batangas

MCLE Compliance No. V-0012314; 12-08-15

NOTICE OF SUBMISSION

THE CLERK OF THE TRIBUNAL

Presidential Electoral Tribunal

Padre Faura, Manila

ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee Robredo

c/o Sardillo Sardillo Salom Law Office

Unit 802, Taipan Place, F. Ortigas Avenue,

Ortigas Center, Pasig City

THE SOLICITOR GENERAL

134 Amorsolo Street

Legaspi Village, 1229 Makati City

M. 765 685 754 22

M. 765 685 768 22

Greetings:

Please take notice that the foregoing *Manifestation and Compliance with Reiterative Motion to Direct the Collection of Ballot Boxes and Other Election Documents and Paraphernalia for the Pilot Protest* shall be submitted for the consideration and approval of this Honorable Tribunal immediately upon receipt hereof.



GEORGE ERWIN M. GARCIA

EXPLANATION

[Pursuant to Rule 30 and 31 of the PET Rules in relation to Section 11, Rule 13 of the 1997 Rules of Civil Procedure]

Copies of the foregoing *Manifestation and Compliance with Reiterative Motion to Direct the Collection of Ballot Boxes and Other Election Documents and Paraphernalia for the Pilot Protest* were served to the above-mentioned parties by registered mail, personal service being impractical due to distance, time and manpower constraints.



GEORGE ERWIN M. GARCIA

Annex 'A'

For Payee's Account only

DOCUMENTARY STAMPS PAID

Manager's Check

CHECK No. 0021056

BRSTN
0105
196-

DATE 10 Jul 2017

PAY TO THE ORDER OF ***PRESIDENTIAL ELECTORAL TRIBUNAL***

P 15,000,000.00

PESOS

BDO PHP 15,000,000.00

**Fifteen Million Pesos and Zero Centavos

We allow the electronic clearing of this check and hereby waive the presentation for payment of this original to BDO Unibank, Inc.

BDO

MAKATI AVENUE - AYALA BRANCH
L.V. LOCSIN BLDG., AYALA AVE.
COR. MAKATI AVE. 1228 MAKATI CITY

Valid only within six (6) months from date of issue

⑈00000021056⑈01053⑈1967⑈0000000000000000⑈000

Annex 'A-1'

For Payee's Account only

DOCUMENTARY STAMPS PAID

Manager's Check

CHECK No. 0002263

BRSTN
01053
428-1

DATE 10 Jul 2017

PAY TO THE ORDER OF *** PRESIDENTIAL ELECTORAL TRIBUNAL ***

P 15,000,200.00

PESOS

BDO PHP 15,000,200.00

**Fifteen Million Two Hundred Pesos and Zero Centavos

We allow the electronic clearing of this check and hereby waive the presentation for payment of this original to BDO Unibank, Inc.

BDO

BONIFACIO GLOBAL CITY - ONE MCKINLEY PLACE BRANCH
G/F ONE MCKINLEY PLACE, 4TH AVE. CORNER
25TH ST., BONIFACIO GLOBAL CITY, TAGUIG

Valid only within six (6) months from date of issue

⑈0000002263⑈01053⑈4281⑈0000000000000000⑈

B

<input type="checkbox"/> Cash <input checked="" type="checkbox"/> Treasury Warrant <input checked="" type="checkbox"/> Check <input type="checkbox"/> Money Order	Received the amount stated above. BDO No. 21056 Ayalala, Bt. - 215,000 BDO - No. 2263745,000, One McKinley Plaza
Treasury Warrant, Check, Money Order Number	j. Reyes
Date of Treasury Warrant, Check, Money Order	COLLECTING OFFICER

NOTE: Write the number and date of this receipt on the back of treasury warrant, check or money order received.

AFFIDAVIT OF SERVICE

(Revised as of April 1, 1994)

I, **Jerry C. Guevarra**, a clerk of the G.E. GARCIA Law Office with office address at Ground Floor, LAIKO Bldg., Cabildo St., Intramuros, City of Manila, after being duly sworn, do hereby depose and say:

That on July 11, 2017, I served a copy of the following pleading/paper.

NATURE OF PLEADING/PAPER

"MANIFESTATION and COMPLIANCE with REITERATIVE MOTION TO DIRECT THE COLLECTION OF BALLOT BOXES AND OTHER ELECTION DOCUMENTS AND PARAPHERNALIA FOR THE PILOT PROTEST"

In **PET Case No. 005** entitled "**FERDINAND 'BONGBONG' R. MARCOS, JR.,
Protestant, -versus- MARIA LEONOR 'LENI DAANG MATUWID' G. ROBREDO,
Protestee**", pursuant to Sections 3, 4, 5 and 10, Rule 13 of the Rules of Court, as follows:

By Registered Mail:

R. R. Nos.

ATTY. ROMULO B. MACALINTAL
c/o Sardillo Sardillo Salom Law Office
Unit 802, Taipan Place, F. Ortigas Avenue
Ortigas Center, Pasig City

RD 765 685 754 22

THE SOLICITOR GENERAL
134 Amorsolo Street
Legaspi Village, 1229 Makati City

RD 765 685 768 22

By depositing a copy at the post office in Manila, as evidenced by Registry Receipt(s) No(s) and indicated after the name(s) of the addressee(s), and with instructions to the postmaster to return the mail to the sender after ten (10) days if undelivered.

July 11, 2017, Manila, Philippines.

JERRY C. GUEVARRA
Affiant

JUN 11 2017

SUBSCRIBED AND SWORN to before me this _____ at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 79
Page No. 16
Book No. 41
Series of 2017.

ATTY. PEDRO D. GENATO
Notary Public until Dec. 31, 2017
Notarial Commission 2016-011 Mla.
IBP# 1009339 Pasig 09-24-15 until 2017
PTR# 5939951 - Mla. 1-3-2017
Roll# 12088, TIN# 132-436-687
MCLE Compl. No. V-0005232 until 4-14-19

VERIFIED DECLARATION

I, **JERRY C. GUEVARRA**, a clerk of the G.E. GARCIA Law Office with office address at Ground Floor, LAIKO Bldg., Cabildo St., Intramuros, City of Manila, hereby declare that the document/s (and annexes thereof) hereto submitted electronically in accordance with the Efficient use of Paper Rule is/are complete and true copy/ies of the document/s **"MANIFESTATION and COMPLIANCE with REITERATIVE MOTION TO DIRECT THE COLLECTION OF BALLOT BOXES AND OTHER ELECTION DOCUMENTS AND PARAPHERNALIA FOR THE PILOT PROTEST" (with ANNEXES "A" to "B")** in PET Case No. 005 entitled **FERDINAND "BONGBONG" R. MARCOS, JR., Protestant, -versus- MARIA LEONOR "LENI DAANG MATUWID" G. ROBREDO, Protestee,** filed with the Presidential Electoral Tribunal.

Signature: _____
Printed Name: **Jerry C. Guevarra**
Position: Staff
Date: _____, 2017

SUBSCRIBED AND SWORN to before me this JUN 11 2017
at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Person Administering Oath

ATTY. PEDRO D. GENATO

Notary Public until Dec. 31, 2017

Notarial Commission 2016-011 Mla.

IBP# 1009339 Pasig 09-24-15 until 2017

PTR# 5939951 - Mla. 1-3-2017

Roll# 12088, TRN# 132-436-687

MCLE Compl. No. V-0005232 until 4-14-19

Doc. No. 80 ;
Page No. 16 ;
Book No. 41 ;
Series on 2017.