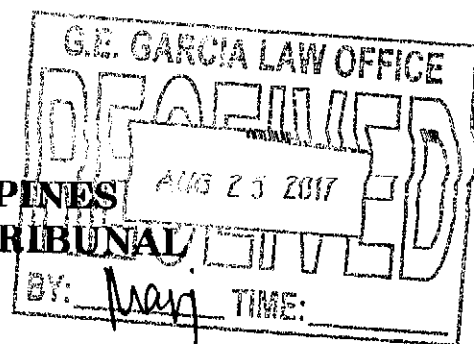


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



FERDINAND "BONGBONG"
R. MARCOS, JR.,

Protestant,

Versus

PET CASE NO. 005
For: Election Protest

MARIA LEONOR "LENI
DAANG MATUWID" G.
ROBREDO,

Protestee.

x—————x

MANIFESTATION

COME NOW, Petitioners, by undersigned counsel, most respectfully state:

1. On August 9, 2017, Petitioners received a copy of an Order from this Honorable Tribunal denying their Urgent Motion for Leave to File and Admit Petition in Intervention;
2. Petitioners filed a Motion for Reconsideration (**Annex "A"**) on the said order by way of registered mail, today, August 22, 2017;
3. Copies of the Motion for Reconsideration will also be filed personally at the Presidential Electoral Tribunal on the following day, August 23, 2017.

RESPECTFULLY SUBMITTED.

City of Malolos, Bulacan for Manila, August 22, 2017.

The Law Office of
PURIFICACION S. BARTOLOME-BERNABE & PARTNERS
Counsel for the Petitioners
3rd Floor Hiyas Bank Building
Mabini Street Guinhawa
Malolos City, Bulacan



PURIFICACION S. BARTOLOME-BERNABE

PTR No. 7660562/01.24.2017/Malolos, Bulacan

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City of Malolos, Bulacan

Roll of Attorneys No. 39458

MCLE Compliance No. V-0000407/8.15.2013

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NOTICE

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PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

ATTY. GEORGE ERWIN M. GARCIA

ATTY. JOAN M. PADILLA

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ATTY. ROMULO B. MACALINTAL

ATTY. MARIA BERNADETTE V. SARDILLO

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Unit 802, Taipan Place

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Pasig City

EXPLANATION

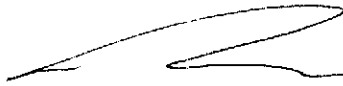
A copy of the foregoing Manifestation was served by registered mail to the abovementioned parties due to distance and lack of office personnel to effect personal service.



ATTY. PURIFICACION S. BARTOLOME-BERNABE

Greetings:

Please take notice that the foregoing Manifestation shall be submitted for the consideration and approval of this Honorable Tribunal immediately upon receipt thereof.



ATTY. PURIFICACION S. BARTOLOME-BERNABE

REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
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FERDINAND "BONGBONG"
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PET CASE NO. 005
For: Election Protest

MARIA LEONOR "LENI
DAANG MATUWID" G.
ROBREDO,

Protestee.

x-----x

MOTION FOR RECONSIDERATION

COME NOW, Movants-Petitioners, by undersigned counsel,
most respectfully state:

TIMELINESS OF FILING

1. This is a motion for reconsideration on an Order of the Honorable Tribunal denying our Urgent Motion for Leave to File and Admit Petition in Intervention. The Order was received personally on August 9, 2017.
2. Under Rule 69, paragraph 2, of the 2010 Rules of the Presidential Electoral Tribunal (PET Rules, hereafter). x x x A party may file a motion for reconsideration within ten days from service of a copy of a decision. x x x."
3. We submit that the Order subject matter of this Motion for Reconsideration is not included in the contemplation of the afore-quoted provision. It is neither a decision nor an order which disposes of the case. Herein petitioners seek to file a Petition for Intervention to the present case, which is a Protest to which a Counter-Protest has been made.
4. In the case of Romeo J. Ordoñez vs. The Honorable Alfredo J. Gustilo (G.R. No. 81835, December 20, 1990), the Supreme Court characterized an intervention thusly:

“x x x An intervention has been regarded as “merely collateral or accessory or ancillary to the principal action and not an independent proceeding; an interlocutory proceeding dependent on or subsidiary to, the case between the original parties.””

5. Clearly, the Order of denial of herein petitioners’ motion for leave to intervene does not dispose of the case. It is an interlocutory order.
6. The 2010 PET Rules do not speak of interlocutory orders. However, it does provide for applicability of Supplementary Rules, thus:

“Section 73. Applicability - The following shall be applicable by analogy or in suppletory character and effect in so far as they may be applicable and are not consistent with these Rules and with the decisions, resolution and orders if the Tribunal, namely:

- a) The Revised Rules of Court;
- b) Decisions of the Supreme Court; and
- c) Decisions of the Electoral Tribunal

x x x”

7. Turning to jurisprudence or decisions of the Supreme Court, we find the case of Ley Construction and Development Corporation, et. al vs. Union Bank of the Philippines (G.R. No. 133801, June 27, 2000) wherein it was held:

“An interlocutory order is always under the control of the court and may be modified or rescinded upon sufficient grounds shown at any time before final judgment.”

8. As applied to the present motion for reconsideration on the Order received on August 9, 2017, it appears that it is not covered by the ten-day bar mentioned in Section 69 of the 2010 PET Rules of Procedure.

9. This motion for reconsideration is filed on August 22, 2017 which is only thirteen (13) days from receipt. It is our submission that it may be allowed by this Honorable Tribunal in the exercise of sound discretion.
10. The second view on timeliness is that, the Order denying the Urgent Motion for Leave to File and Admit Petition in Intervention was received on August 9, 2017. Section 69 of the PET Rules provides for a ten-day period within which a motion for reconsideration may be filed. In computing a period, the first day shall be excluded, and the last included. Following this rule, we count from August 10, 2017 and ten days therefrom is August 19, 2017. This date falls on a Saturday. In addition, the next working day Monday is August 21, 2017, which is also a holiday. This situation falls under Section 1, Rule 22 of the Rules of Court which provides:

“Section 1. How to compute time. — In computing any period of time prescribed or allowed by these Rules, or by order of the court, or by any applicable statute, the day of the act or event from which the designated period of time begins to run is to be excluded and the date of performance included. If the last day of the period, as thus computed, falls on a Saturday a Sunday, or a legal holiday in the place where the court sits, the time shall not run until the next working day.”

11. The next working day to August 21, 2017 is August 22, 2017 which is a Tuesday. This is the real deadline.
12. Filing this motion for reconsideration on August 22, 2017 means it is timely filed.

THE ANTECEDENT FACTS

13. Petitioner filed an Urgent Motion for Leave to File and Admit Petition in Intervention with Petition in Intervention attached on June 27, 2017. The principal action to which petitioners wanted to intervene was the election protest filed by Ferdinand Marcos, Jr. and the

counter-protest which Vice President Maria Leonor G. Robredo filed against him.

14. This Honorable Tribunal directed them both to pay cash deposit. They were required to pay in two installments. The first installment was already paid at the time of filing of this urgent motion. The payment for the second installment was set on July 14, 2017.
15. It came to the attention of herein movants-petitioners that Vice President Maria Leonor G. Robredo was having difficulty in raising the money for the second installment. Movants-petitioners all voted for Vice President Robredo during the last elections. They are fearful that as citizens and voters, they would be deprived of the outcome of the election – the victory for Vice President Robredo - which was a direct result of the exercise of their constitutional right of suffrage only because she could not come up with the cash deposit. Hence, they started to raise funds for the purpose of helping Vice President Robredo to pay the second installment, and more importantly, to protect the votes they cast. They filed the instant Urgent Motion for Leave to File and Admit Petition in Intervention with Petition in Intervention.
16. On August 9, 2017, movants-petitioners received copy of a Resolution from this Honorable Tribunal denying their urgent motion.
17. They seek a reconsideration of the denial of the motion, based on the following grounds:

I

*Movants-petitioners have
standing in this case.*

II

*The rules do not prohibit
the payment of the filing
fees directly by the voters.*

III

*Payment will achieve a just
and expeditious disposition
of the case.*

Movants-petitioners have standing in this case.

18. In the present case, the movants-petitioners are tax payers and voters in the last elections for President and Vice-President. In the exercise of their right of suffrage, the outcome for the Vice-Presidential position was declared to be in favor of Maria Leonor G. Robredo. However, the result of that election became the subject of a protest from the losing candidate, Ferdinand R. Marcos, Jr. After the protest was filed, Vice-President Maria Leonor G. Robredo was constrained to file a counter-protest. Both parties were required to pay cash deposit, a requirement under the Rules. They were to pay in two installments. The parties both paid the first installment. Ferdinand Marcos, Jr. paid the second installment too.
19. The second installment for Vice President Maria Leonor G. Robredo amounted to Php 7,439,000.00. She had difficulty coming up with the second installment. On July 13, 2017, she filed an Urgent Motion to Defer Payment of Second Installment of Additional Cash Deposit.
20. On August 18, 2017, this Honorable Tribunal granted the said motion, remarking that the required amount shall be paid "only after initial determination has been made that the protestant (Ferdinand R. Marcos, Jr.) has made substantial recovery in his three (3) designated pilot provinces.
21. In the meanwhile, herein movants-petitioners have gathered the amount of Php 6,847,159.34 as of August 18, 2017, and it increases by the day. This is six hundred thousand pesos less than the target amount. This is an overwhelming display of support from citizens from all walks of life. Tricycle drivers, waiters, students foregoing their lunch, islanders who rode boats to make the deposit, market vendors, recovering heart patients, government employees stood with fellow citizens who could afford sizable contributions, their number added to more than twenty five thousand strong, in order to protect the outcome of the exercise of their right of suffrage – a victory for Vice President Maria Leonor G. Robredo.

22. In contrast, Ferdinand R. Marcos, Jr. publicly declared that he had at least forty friends and supporter who helped him to readily raise his cash deposit.

23. Under this factual milieu, the movants-petitioners seek to intervene in the protest-counter-protest so they can directly pay to this Honorable Tribunal the cash deposit required of Vice President Maria Leonor G. Robredo. This is a necessary consequence of the exercise of the right of suffrage which includes the protection of the outcome of the election. Otherwise, their exercise of this constitutional right during the last elections would be rendered naught.

24. In the case of Arturo M. Tolentino and Arturo Mojica vs. Commission on Elections, et. al. (G.R.. No. 148334, January 21, 2004), the Court ruled that:

“ “Legal standing” or *locus standi* refers to a personal and substantial interest in a case such that the party has sustained or will sustain direct injury because of the challenged governmental act.” It remarked that a party will be allowed to litigate only when:

“ (1) he can show that he has personally suffered some actual or threatened injury because of the allegedly illegal conduct of the government; (2) the injury is fairly traceable to the challenged action; and (3) the injury is likely to be redressed by a favorable action”

25. However, in the same case, the Honorable Court has also held:

“Having stated the foregoing, this Court has the discretion to take cognizance of a suit which does not satisfy the requirement of legal standing when paramount interest is involved. In not a few cases, the court has adopted a liberal attitude on the locus standi of a petitioner where the petitioner is able to craft an issue of transcendental significance to the people. Thus, when the issues raised are of paramount

importance to the public, the Court may brush aside technicalities of procedure.

X X X

We accord the same treatment to petitioners in the instant case in their capacity as voters since they raise important issues involving their right of suffrage, considering that the issue raised in this petition is likely to arise again.” (Emphasis Supplied)

26. It is submitted that the facts obtaining in the present case create such an issue of transcendental significance to the public who voted for a winning candidate, whose victory will be cast aside if they are not allowed to intervene and directly shoulder the cash deposit required by this Honorable Tribunal.

27. Election contests involve the adjudication not only of private and pecuniary interests of rival candidates, but also of **paramount public interest considering the need to dispel uncertainty over the real choice of the electorate.**¹

28. The rights of the contending parties in the position aspired for yields to the **far greater interest of the citizens** in the sanctity of the electoral process.²

29. Here, no less than members of the electorate seek to dispel any uncertainty over their real choice.

30. Not only that, in the seminal case of Irineo Moya vs. Agripino Ga. Del Fiero (G.R. No. L-46863, November 18, 1939), the Supreme Court remarked:

¹ *Martinez III vs. House of Representatives Electoral Tribunal*, G.R. No. 189034 (12 January 2010).

² *Arao vs. Commission on Elections*, G.R. No. 103877 (23 June 1992).

“As long as popular government is an end to be achieved and safeguarded, suffrage, whatever may be the modality and form devised, must continue to be the means by which the great reservoir of power must be emptied into the receptacular agencies wrought by the people through their Constitution in the interest of good government and the common weal. Republicanism, in so far as it implies the adoption of a representative type of government, necessarily points to the enfranchised citizen as a particle of popular sovereignty and as the ultimate source of the established authority.”
(Emphasis supplied)

31. For which reason, an enfranchised voter must never be denied the right to be heard and must always be allowed to protect the results of having exercised the same.
32. The “far-reaching implications” of this petition for intervention is better illustrated in reverse. Its denial would mean the curtailment of the constitutional right of suffrage which includes the protection of election results. It would mean the deprivation of victory from a candidate with financial limitations. This effect is akin to imposing a property requirement for public office.
33. Speaking against property requirement for public office, in the case of *Leon G. Maquera vs. Juan Borra, COMELEC, et. al.* (G.R. No. L-24761, September 7, 1965), the Supreme Court, in a Per Curiam Resolution stated thusly:

“That said property qualifications are inconsistent with the nature and essence of the Republican system ordained in our Constitution and the principle of social justice underlying the same, for said political system is premised upon the tenet that sovereignty resides in the people and all government authority emanates from them, and this, in turn, implies necessarily that the right to vote and to be voted for shall not be dependent upon the wealth of the individual concerned, whereas social justice presupposes

equal opportunity for all, rich and poor alike, and that, accordingly, no person shall, by reason of poverty, be denied the chance to be elected to public office"

34. If movants-petitioners are not allowed to directly intervene to pay the cash deposit, Vice President Maria Leonor G. Robredo would be denied of her victory only because of financial limitations.

35. The fact that this Honorable Tribunal has deferred the payment of the second installment for Vice President Maria Leonor G. Robredo, should not preclude it from deciding on the present motion for reconsideration and addressing the issue of the propriety of allowing the intervention. Addressing the issue now would merely affirm the movants-petitioner's right to protect the election results and their candidates' victory but also let movants-petitioners prepare and preserve the funds for this purpose. As such, they would be ready to deposit it when the Honorable Tribunal orders Vice President Maria Leonor G. Robredo to do so.

The rules do not prohibit the payment of the filing fees directly by the voters.

36. The PET Rules do not prohibit payment of the filing fees by someone other than the parties.

37. Rule 32 of the Rules provides that "[n]o protest, counter-protest or petition for *quo warranto* shall be deemed filed without payment to the Tribunal of the filing fee".³

³ Section 32 of the Rules relevantly provides:

"Rule 32. *Filing fees.* - No protest, counter-protest or petition for *quo warranto* shall be deemed filed without payment to the Tribunal of the filing fee in the amount of One Hundred Thousand Pesos (P100,000.000).

If a claim for damages or attorney's fees is set forth in a protest, counter-protest or petition for *quo warranto*. An additional filing fee shall be paid, which shall be, If the sum is claimed is:

Not more than P20,000	P240.00
More than P20,000 but less than P40,000 . .	P300.00
P40,000 or more but less than P60,000	P400.00

38. A plain reading of the Rule shows that the only critical factor is that payment is made to the Tribunal.
39. What is not prohibited by law may be done, unless the act is contrary to morals, customs and public order.⁴
40. In *Knights of Rizal vs. DMCI Homes, Inc.*, G.R. No. 213948 (25 April 2017), the Honorable Supreme Court ruled that it is the law itself — Articles 1306 and 1409 (1) of the Civil Code — which prescribes that acts not contrary to morals, good customs, public order, or public policy are allowed if also not contrary to law. Otherwise, ***the rights, freedoms, and civil liberties of citizens can be arbitrarily and whimsically trampled upon*** by the shifting passions of those who can shout the loudest, or those who can gather the biggest crowd or the most number of Internet trolls:

“In *Manila Electric Company v. Public Service Commission*, the Court held that ‘what is not expressly or impliedly prohibited by law may be done, except when the act is contrary to morals, customs and public order.’ This principle is fundamental in a democratic society, to protect the weak against the strong, the minority against the majority, and the individual citizen against the government. In essence, **this principle, which is the foundation of a civilized society under the rule of law**, prescribes that the freedom to act can be curtailed only through law. Without this principle, the rights, freedoms, and civil liberties of citizens can be arbitrarily and whimsically trampled upon by the shifting passions of those who can shout the loudest, or those who can gather the biggest crowd or the most number of Internet trolls. In other instances, the Court has allowed or upheld actions that were not expressly prohibited by statutes when it determined that these acts were

P60,000 or more but less than P80,000	P500.00
P80,000 or more but less than P100,000 . . .	P800.00
P100,000 or more but less than P150,000 .	P1200.00
For each P1,000 in excess of P150,000	P100.00 ⁴

⁴ *Knights of Rizal vs. DMCI Homes, Inc.*, G.R. No. 213948 (25 April 2017).

not contrary to morals, customs, and public order, or that upholding the same would lead to a more equitable solution to the controversy. However, it is the law itself — Articles 1306 and 1409 (1) of the Civil Code — which prescribes that acts not contrary to morals, good customs, public order, or public policy are allowed if also not contrary to law.” [Emphasis and underscoring supplied]

41. The foregoing principle equally applies to matters of procedure before the Honorable Supreme Court.
42. In *Habaluyas Enterprises, Inc. vs. Japson*, G.R. No. 70895 (30 May 1986), the Supreme Court allowed a motion for extension of time to file a motion for reconsideration of a final order or judgment. It found that it would be unfair to deprive parties of their right to appeal simply because they availed themselves of a procedure which was not expressly prohibited by the law or the Rules.
43. In exercising and affirming their right of suffrage, petitioners wish to submit the payment of the filing fees for the counter-protest. This is why they filed the instant Motion and Petition, intervening ***only to the extent of*** paying the filing fees of the counter-protest. This is ***not expressly prohibited*** by the law or the Rules.
44. This is even consistent with the ruling of the Supreme Court that the law governing electoral contests must be liberally construed to the end that ***the will of the people may not be defeated***. The primordial policy to ascertain the will of the people is evident in the constitutional mandate that “(s)overeignty resides in the people and all government authority emanates from them.”⁵

*Payment will achieve a just
and expeditious disposition
of the case.*

⁵ *Loyola vs. HRET*, G.R. No. 109026 (04 January 1994), citing *Tatlonghari vs. COMELEC*, G.R. No. 86645 (31 July 1991)

45. There is no doubt that payment of filing fees is burdensome. And yet, it is necessary before a case can proceed.
46. In the case of protestant Marcos, even his filing fees were supposedly paid by third parties who “wish that the election protest be resolved with dispatch.”⁶
47. With the payment of the filing fees of protestant Marcos, the case has proceeded.
48. Incidentally, the payment by other individuals for protestant Marcos was done without asking for leave of court; and it was accepted by this Honorable Tribunal without any question.
49. What should be stressed is that the PET Rules shall be liberally construed to achieve a just and expeditious determination and disposition of every contest.⁷
50. In closing, we reiterate, that the Petition for Intervention should be allowed as it raises an issue of transcendental importance and there is no substantial or procedural bar thereto.

PRAYER

WHEREFORE, premises considered, it is respectfully prayed that this Motion for Reconsideration be granted.

Other reliefs just and equitable under the circumstances are likewise prayed for.

⁶ Paison, Patty, “LOOK: Marcos’ donors for the P36-million recount fee”, Rappler, available at <http://www.rappler.com/newsbreak/focus/look/387162/look-marcos-donors-election-recount-fee/> (last accessed on 20 July 2017). For immediate reference of the Honorable Tribunal, a copy is attached as **Annex “1”**.

⁷ Rule 3 of the Rules, which states:

“Rule 3. *Construction.* — These Rules shall be liberally construed to achieve a just, expeditious, and inexpensive determination and disposition of every contest before the Tribunal.”

City of Malolos, Bulacan for Manila, August 22, 2017.

The Law Office of
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Counsel for the Movants-Petitioners
3rd Floor Hiyas Bank Building
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Malolos City, Bulacan



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EXPLANATION

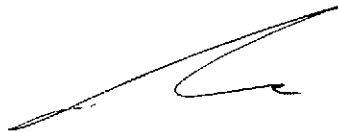
A copy of the foregoing Motion for Reconsideration was served by registered mail to the abovementioned parties due to distance and lack of office personnel to effect personal service.



ATTY. PURIFICACION S. BARTOLOME-BERNABE

Greetings:

Please take notice that the foregoing Motion for Reconsideration shall be submitted for the consideration and approval of this Honorable Tribunal immediately upon receipt thereof.



ATTY. PURIFICACION S. BARTOLOME-BERNABE

AFFIDAVIT OF SERVICE BY REGISTERED MAIL

I, **PURIFICACION B. BERNABE**, of The Law Office of Purificacion S. Bartolome-Bernabe & Partners, with office address at 3rd Floor Hiyas Bank Building, Mabini Street Guinhawa, Malolos City, Bulacan, after being duly sworn, depose and say:

On August 22, 2017 I served copies of the **MOTION FOR RECONSIDERATION** in PET Case No. 005 entitled, "*Marcos v. Robredo*", Presidential Electoral Tribunal, Manila, pursuant to the Rules of Court, by registered mail to:

ATTY. GEORGE ERWIN M. GARCIA

ATTY. JOAN M. PADILLA

Counsel for Protestant Marcos
Ground Floor, Laiko Building
372 Cabildo Street, Intramuros
Manila City

ATTY. ROMULO B. MACALINTAL

ATTY. MARIA BERNADETTE V. SARDILLO

Counsel of Protestee Robredo
Unit 802, Taipan Place
F. Ortigas Avenue, Ortigas Center
Pasig City

By depositing copies in the post office at Malolos, Bulacan with Registry Receipt Nos. ~~RD 361 002 02172~~ and ~~RD 361 002 02822~~, hereto attached and indicated after the names of the addressees, and with instructions to the post-master to return the mail to the sender after ten (10) days if undelivered.

PURIFICACION B. BERNABE
Affiant

SUBSCRIBED AND SWORN TO before me on Aug 22 2017 in MALDLOS, BULAC affiant exhibiting to me his competent evidence of identification, which bears his photo and signature, in the form of Passport No. EC0682320 issued on March 27, 2014 by DFA NCR EAST.

Notary Public
NOTARY PUBLIC

Doc No. 212 ;
Page No. 44 ;
Book No. 3 ;
Series of 2017.

Republic of the Philippines)
_____) SS

AFFIDAVIT OF SERVICE BY REGISTERED MAIL

I, **PURIFICACION B. BERNABE**, of The Law Office of Purificacion S. Bartolome-Bernabe & Partners, with office address at 3rd Floor Hiyas Bank Building, Mabini Street Guinhawa, Malolos City, Bulacan, after being duly sworn, depose and say:

On August 22, 2017 I served copies of the **MANIFESTATION** in PET Case No. 005 entitled, "*Marcos v. Robredo*", Presidential Electoral Tribunal, Manila, pursuant to the Rules of Court, by registered mail to:

ATTY. GEORGE ERWIN M. GARCIA

ATTY. JOAN M. PADILLA


Counsel for Protestant Marcos
Ground Floor, Laiko Building
372 Cabildo Street, Intramuros
Manila City

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ATTY. MARIA BERNADETTE V. SARDILLO

Counsel of Protestee Robredo
Unit 802, Taipan Place
F. Ortigas Avenue, Ortigas Center
Pasig City

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PURIFICACION B. BERNABE

Affiant

SUBSCRIBED AND SWORN TO before me on _____ in _____, affiant exhibiting to me his competent evidence of identification, which bears his photo and signature, in the form of Passport No. EC0682320 issued on March 27, 2014 by DFA NCR EAST.

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