

REPUBLIC OF THE PHILIPPINES  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
Manila



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

*Protestant,*

-versus -

**PET Case No. 005**

For: Election Protest  
Vice-President

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

*Protestee.*

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**MOTION FOR ADDITIONAL TIME**

The **COMMISSION ON ELECTIONS**, through the **OFFICE OF THE SOLICITOR GENERAL**, and in compliance with this Honorable Tribunal's *Resolution* dated 29 August 2017, states that:

1. On 5 September 2017, the COMELEC received this Honorable Tribunal's *Resolution* dated 29 August 2017 directing it to show cause why the COMELEC local officers of Bucay, Abra and COMELEC Central Office failed to seek prior approval from the Honorable Tribunal before the conduct of the activity in accordance with the Precautionary Protection Order, within a period of ten (10) days from receipt of the *Manifestation* dated 17 August 2017 of Hon. Corpuz B. Alzate.

2. In a *Manifestation/Compliance with Motion* dated 14 September 2017, the COMELEC manifested that it received the *Manifestation* of Hon. Alzate on 6 September 2017, and thus, has until 18 September 2017<sup>1</sup> within which to file its Compliance with this Honorable Tribunal's show cause order.

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<sup>1</sup> Considering that the last day, 16 September 2017, falls on a Saturday, the COMELEC has until today, the next working day, 18 September 2017, within which to comply with this Honorable Tribunal's Resolution dated 29 August 2017.

3. Undersigned counsel, however, is still coordinating with the officers and employees of the COMELEC Central Office and the COMELEC local officers of Bucay, Abra for information and documents to ensure that the allegations in the compliance to be filed in response to this Honorable Tribunal's show cause order are complete and accurate.

4. For this reason, and considering as well the demands of equally urgent professional work on the part of the undersigned and the COMELEC officials and employees who are preparing for the local elections in October, and the suspension of work in government offices on 12 September 2017 due to typhoon, the COMELEC is unable to and needs more time to comply with this Honorable Tribunal's order to show cause.

### **PRAYER**

**WHEREFORE**, the **COMMISSION ON ELECTIONS** respectfully prays this Honorable Tribunal to **GRANT** it an additional period of ten (10) days from 16 September 2017, or until 26 September 2017, within which to comply with this Honorable Tribunal's show cause order as contained in its *Resolution* dated 29 August 2017.

Other relief just and equitable under the premises are likewise prayed for.

Makati City for the City of Manila, 18 September 2017.

**JOSE C. CALIDA**

*Solicitor General*

Roll No. 24852

IBP Lifetime No. 015360, 08/18/16

MCLE Exemption No. VI-000016, 09/28/16

**MOTION FOR ADDITIONAL TIME**

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**COMMISSION ON ELECTIONS**

**HON. ANDRES D. BAUTISTA**

**MOTION FOR ADDITIONAL TIME**

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**HON. CHRISTIAN ROBERT S. LIM**

Intramuros, 1002 Manila

**EXPLANATION FOR SERVICE BY REGISTERED MAIL**

In compliance with Section 11, Rule 13 of the Rules of Court, counsel respectfully manifests that the foregoing **MOTION FOR ADDITIONAL TIME** will be served by registered mail because of distance constraints, as well as the limited number of office messengers, which make personal service thereof impracticable.

  
**JOSE ANGELO A. DAVID**

*Associate Solicitor*