

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

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

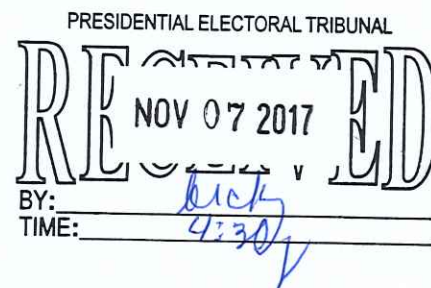
Protestant,

-versus-

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

Protestee.

X - - - - - X



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

STRONG COMMENT/OPPOSITION

[TO THE URGENT *EX-PARTE* MOTION TO BE ALLOWED TO
SECURE SOFT COPIES OF THE BALLOT IMAGES AND OTHER
REPORTS FROM THE DECRYPTED SECURED DIGITAL CARDS]

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

1. On **3 November 2017**, protestant Marcos received a copy
of protestee's *Urgent Ex-Parte Motion to be Allowed to Secure Soft
Copies of the Ballot Images and Other Reports from the Decrypted
Secured Digital Cards* dated 23 October 2017 relative to the ongoing
decryption and printing of the ballot images, election returns and
audit logs for **ALL** the protested clustered precincts of the pilot
provinces of Camarines Sur, Iloilo and Negros Oriental.

2. The aforesaid Motion should be **DENIED** by this
Honorable Tribunal.

3. Protestee Robredo should not be allowed to secure both
printed and soft copies of the ballot images, election returns, audit
logs and other relevant documents which were generated during the

decryption of the secure digital (SD) images for **ALL** the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental during the last 2016 elections given that she did not file any *Motion for Decryption* relative thereto.

4. It must be recalled the decryption proceeding in this case was solely initiated by protestant Marcos. Protestee Robredo did not join the protestant in pursuing this undertaking. On the contrary, protestee Robredo even opposed the requested decryption of the SD images in her *Comment/Opposition* dated 14 June 2017.

5. It also bears emphasis that the costs for the conduct of the decryption and printing of the ballot images, election returns and audit logs for **ALL** the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental used during the last 9 May 2016 National and Local elections in the amount of ***Two Million Nine Hundred SeventyFour Thousand Seventy Five Pesos (Php2,974,075.00)*** were shouldered and paid for solely by protestant Marcos. The same is true with respect to the supplies required by the Election Records and Statistics Department (ERSD) of the COMELEC, which were procured and delivered by protestant Marcos, for the conduct of the decryption proceeding.

6. Since protestee Robredo did not contribute any share in the expenses and supplies for this undertaking, she should not be allowed by this Honorable Tribunal to obtain the soft (and even printed) copies of the decrypted images of the ballots, election returns, audit logs and other relevant documents for **ALL** the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental used during the last 9 May 2016 National and Local elections.

P R A Y E R

ACCORDINGLY, it is most respectfully prayed of this Honorable Tribunal to **DENY** protestee's *Urgent Ex-Parte Motion to be Allowed to Secure Soft Copies of the Ballot Images and Other Reports from the Decrypted Secured Digital Cards* dated 23 October 2017 and to duly **NOTE** the foregoing submission.

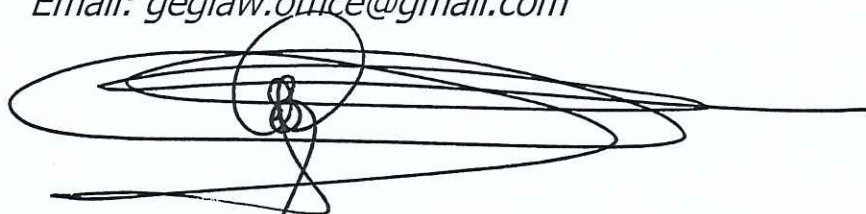
Other reliefs, just and equitable under the premises, are also prayed for.

City of Manila, Philippines, **6 November 2017.**

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Director IV

Election Records and Statistics Department

Commission on Elections

Palacio Del Gobernador, Intramuros

1002 Manila

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 *Comment/Opposition* were served to the above-mentioned parties by registered mail, personal service being impractical due to distance, time and manpower constraints.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke, positioned above the name George Erwin M. Garcia.

GEORGE ERWIN M. GARCIA

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 November 07, 2017, I served a copy of the following pleading/paper.

NATURE OF PLEADING/PAPER

"STRONG COMMENT/OPPOSITION

[TO THE URGENT *EX-PARTE* MOTION TO BE ALLOWED TO SECURE SOFT COPIES OF THE BALLOT IMAGES AND OTHER REPORTS FROM THE DECRYPTED SECURED DIGITAL CARDS]"

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:

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

R. R. Nos.

113229

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

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DIR. ESTER L. VILLAFLORES-ROXAS
Election Records and Statistics Department
Commission on Elections
Palacio Del Gobernador, Intramuros
1002 Manila

906791

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.

November 07, 2017, Manila, Philippines.

JERRY C. GUEVARRA
Affiant

SUBSCRIBED AND SWORN to before me this NOV 7 2017 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 337
Page No. 6
Book No. XLV
Series of 2017.

Yolanda M. Guevarra
YOLANDA M. GUEVARRA
Notary Public
Until December 31, 2018
PRT No. 3489452
Resident of Manila 1-3-17
TIN 137-029-011
MCLE Compliance No. 47-0000676

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 **"STRONG COMMENT/OPPOSITION [TO THE URGENT *EX-PARTE* MOTION TO BE ALLOWED TO SECURE SOFT COPIES OF THE BALLOT IMAGES AND OTHER REPORTS FROM THE DECRYPTED SECURED DIGITAL CARDS]"** 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: November 07, 2017

SUBSCRIBED AND SWORN to before me this NOV 07 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

Until December 31, 2018

PSN No. 8939452

Exp. Date: 12-31-17

PSN No. 8939452

MEPS Compliance No. 17-0000676

Doc. No. 338;

Page No. 69;

Book No. XLVI;

Series on 2017.