

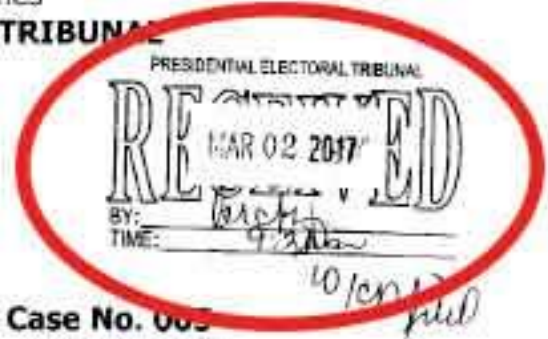
CLIENT'S COPY

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

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

-versus-

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



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

X-----X

**EX-PARTE MOTION FOR LEAVE TO SECURE PRINTED
COPIES OF THE BALLOT IMAGES, AUDIT LOG
REPORTS, ELECTION RETURNS, AND OTHER
PERTINENT DOCUMENTS RELATIVE TO THE
DECRYPTION OF THE SECURE DIGITAL CARDS IN
ELECTION PROTEST CASE NO. 16-007**

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

1. On **02 February 2017**, Protestant Marcos, through the undersigned counsel, received a Notice from the Election Records and Statistics Department ("ERSD") of the Commission on Elections ("Comelec") regarding the decryption of the Secure Digital (SD) cards and printing of ballot images, election returns and audit logs for the *twenty five (25)* protested clustered precincts of the Municipality of Siruma, Camarines Sur used during the 09 May 2016 National and Local Elections relative to **Election Protest Case No. 16-007** entitled "*Carina Polinga v. Sandy Ondis*," which was scheduled on 15 February 2017 until its completion.

2. Considering that the Municipality of Siruma, Province of Camarines Sur is among the protested areas subject of this election protest, herein Protestant would like to respectfully request this Honorable Tribunal for leave to secure printed copies of the ballot

images, election returns, audit logs and other pertinent documents relative to the aforementioned decryption of the SD cards in **Election Protest Case No. 16-007** entitled "*Carina Polinga v. Sandy Ondis*."

3. Protestant Marcos is willing to defray the administrative cost and expenses relative to his request.

4. This Motion is not intended for delay but dictated solely by the foregoing circumstances.

PRAYER

ACCORDINGLY, it is most respectfully prayed of this Honorable Tribunal to **GRANT** the foregoing Motion and to **DIRECT** the COMELEC-ERSD to furnish Protestant Marcos and/or his authorized representative/s with printed copies of the ballot images, election returns, audit logs and other pertinent documents relative to the aforementioned decryption of the SD cards in **Election Protest Case No. 16-007** entitled "*Carina Polinga v. Sandy Ondis*."

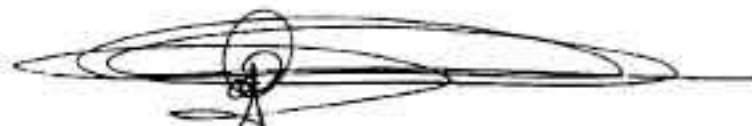
Other reliefs, just and equitable under the premises, are also prayed for.

City of Manila, Philippines, **22 February 2017.**

G.E. GARCIA LAW OFFICE

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By:



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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,
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P.R. 102145

HON. ANDRES D. BAUTISTA

Chairperson
Commission on Elections
Palacio Del Gobernador, Intramuros
1002 Manila

N). 724 077 290 ^{cc}

THE SOLICITOR GENERAL

134 Amorsolo Street
Legaspi Village, 1229 Makati City

R.R. 102144

ESTER L. VILLAFLORES-ROXAS

Director IV
Election Records and Statistics Department
Commission on Elections
Palacio Del Gobernador, Intramuros
1002 Manila

N). 724 097 309 ^{cc}

GREETINGS:

Please be advised that undersigned counsel for protestant Marcos is submitting the foregoing *Ex-Parte Motion for Leave to Secure Printed Copies of the Ballot Images, Audit Log Reports, Election Returns, and other Pertinent Documents Relative to the Decryption of the Secure Digital Cards In Election Protest Case No. 16-007* for the consideration and approval of this Honorable Tribunal immediately upon receipt thereof.


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 *Ex-Parte Motion for Leave to Secure Printed Copies of the Ballot Images, Audit Log Reports, Election Returns, and other Pertinent Documents Relative to the Decryption of the Secure Digital Cards In Election Protest Case No. 16-007* 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

Marcos v. Robredo
Motion for Leave to Secure Printed Copies of the Ballot Images
Audit Logs Report, Election Returns

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:

MAR 02 2017

That on March _____, 2017, I served a copy of the following pleading/paper.

NATURE OF PLEADING/PAPER

"EX-PARTE MOTION FOR LEAVE TO SECURE PRINTED COPIES OF THE BALLOT IMAGES, AUDIT LOG REPORTS, ELECTION RETURNS, AND OTHER PERTINENT DOCUMENTS RELATIVE TO THE DECRYPTION OF THE SECURE DIGITAL CARDS IN ELECTION PROTEST CASE NO. 16-007"

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. No.

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

RA 102145

HON. ANDRES D. BAUTISTA
Chairperson
Commission on Elections
Palacio Del Gobernador, Intramuros
1002 Manila

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134 Amorsolo Street
Legaspi Village, 1229 Makati City

RA 102146

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

RA 724 077 309 ^{cc}

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.

MAR 02 2017

March _____, 2017, Manila, Philippines.

JERRY C. GUEVARRA
Affiant

SUBSCRIBED AND SWORN to before me **MAR 02 2017** at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 904
Page No. 1/1
Book No. 77
Series of 2017.

ATTY. PEDRO D. GENATO
Notary Public until Dec. 31, 2017
Notarial Commission 2016-011 Ma.
ID# 1009339 Pasig 09-24-15 until 2017
PTR# 5929951 - Ma. 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 **"EX-PARTE MOTION FOR LEAVE TO SECURE PRINTED COPIES OF THE BALLOT IMAGES, AUDIT LOG REPORTS, ELECTION RETURNS, AND OTHER PERTINENT DOCUMENTS RELATIVE TO THE DECRYPTION OF THE SECURE DIGITAL CARDS IN ELECTION PROTEST CASE NO. 16-007"** 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: March _____, 2017

MAR 02 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.

Person Administering Oath

Doc. No. 904 ;
Page No. 01 ;
Book No. 14 ;
Series on 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# 5929951 - Mla. 1-3-2017
Roll# 12088, TIN# 132-436-687
MCTE Compl. No. V-0005222 until 2017