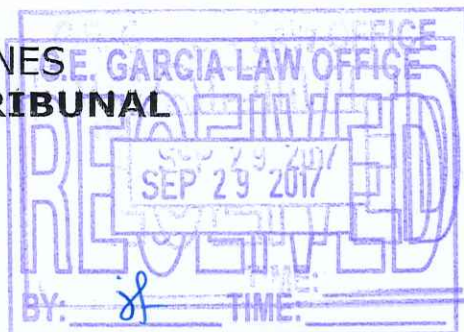


REPUBLIC OF THE PHILIPPINES  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
Manila



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

*Protestant,*

-versus -

**PET Case No. 005**

For: Election Protest  
Vice-President

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

*Protestee.*

X- - - - - X

**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 18 September 2017, the COMELEC asked for additional time until 26 September 2017 within which to comply with 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.

2. A draft of the Compliance to this Honorable Tribunal's show cause order is already being drafted. The draft, however, will still have to undergo internal review, as well as further review by the COMELEC Central Office and COMELEC local officers of Bucay, Abra in order to ensure that the allegations in said Compliance are complete and accurate.

**MOTION FOR ADDITIONAL TIME**

MARCOS v. ROBREDO

PET Case No. 005

X-----X

3. 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 21 September 2017, undersigned counsel needs more time to finalize its compliance with this Honorable Tribunal's show cause order.

**PRAYER**

**WHEREFORE**, the **COMMISSION ON ELECTIONS** respectfully prays this Honorable Tribunal to **GRANT** it an additional period of ten (10) days from 26 September 2017, or until 6 October 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, 25 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

**HENRY S. ANGELES**

*Assistant Solicitor General*

Roll No. 45837

IBP Lifetime No. 016075, 4/21/17

MCLE Compliance No. V-0026001, 10/14/16

MOTION FOR ADDITIONAL TIME  
MARCOS v. ROBREDO  
PET Case No. 005  
X-----X



**JOSE ANGELO A. DAVID**

*Associate Solicitor*

Roll No. 64181

IBP No. 1033274, 04/17/17

MCLE Compliance No. V-0016027, 03/15/16

**OFFICE OF THE SOLICITOR GENERAL**

134 Amorsolo St., Legaspi Village

1229 Makati City

Tel. No.: 9881674 (Trunkline)

Fax No.: 8176037

Copy furnished:

**ATTY. GEORGE ERWIN M. GARCIA**

**ATTY. JOAN M. PADILLA**

*Counsel for Protestant*

G.E. Garcia Law Office

Ground Floor Laiko Bldg.

372 Cabildo Street

Intramuros, 1002 Manila

**ATTY. JOSE AMOR M. AMORADO**

*Collaborating Counsel for Protestant*

MOST Law Office

30<sup>th</sup> Floor, Tycoon Centre, Pearl Drive

Ortigas Center, Pasig City 1605

**ATTY. ROMULO B. MACALINTAL**

*Lead Counsel for Protestee*

Sardillo Sardillo Salom Law Office

Unit 802 Taipan Place

F. Ortigas Avenue

Ortigas Center, Pasig City 1605

**COMMISSION ON ELECTIONS**

**HON. ANDRES D. BAUTISTA**

**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*