

Republic of the Philippines
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila

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

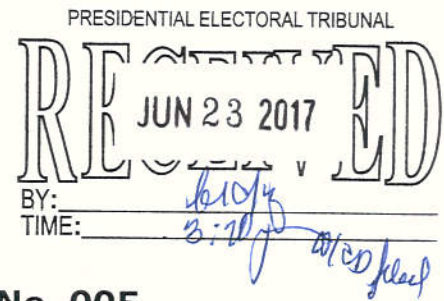
Protestant,

-versus-

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

Protestee.

X- - - - - X



PET Case No. 005

For: Election Protest
Vice-President

MANIFESTATION with MOTION

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

1. In compliance with this Honorable Tribunal's *Resolutions* dated 25 April 2017 and 06 June 2017, protestant Marcos filed his *Preliminary Conference Brief* on **16 June 2017**. One of the items contained therein is the list of *three (3)* provinces designated by the protestant as part of his pilot protest.

2. Among the pilot provinces designated in this election protest is the Province of Camarines Sur. It may be recalled that protestant Marcos is assailing, impugning and protesting the election results for the position of Vice-President in **ALL** of the **one thousand eight hundred sixteen (1,816) protested clustered precincts** that functioned in the province of Camarines Sur because the same do not reflect the true results of the elections thereat.

3. Pertinent thereto, protestant Marcos was informed that the House of Representatives Electoral Tribunal (HRET) issued an *Order* dated **09 June 2017** for the collection, retrieval and turn over of the relevant ballot boxes, election documents and other paraphernalia

used in relation to the case of "*Imelda A. Papin v. Arnulfo "Noli" P. Funetebella*," which is docketed as **HRET Case No. 16-024 (EP)**. In particular, the HRET directed the Secretary of the said Tribunal to immediately take the necessary steps and action for the **COLLECTION** of the ballot boxes containing the ballots, Voters Registration Records (VRRs)/ Book of Voters, Election Day Computerized Voters' Lists (EDCVLs) with voting records and other election documents and paraphernalia used in the protested clustered precincts of the Fourth District of Camarines Sur during the last 09 May 2016 elections. The HRET further directed all election officers and city/municipal treasurers in the Fourth District of Camarines Sur to **TURN OVER** the pertinent ballot boxes containing the ballots, VRRs/ Book of Voters, EDCVLs with voting records and other election documents and paraphernalia used in the last elections to the duly authorized representatives of the HRET.

4. With all due respect to this Honorable Tribunal and the HRET, protestant Marcos is constrained to contest and oppose the aforementioned HRET *Order* dated 09 June 2017 on the ground that **ALL** of the **one thousand eight hundred sixteen (1,816) clustered precincts** that functioned in the province of Camarines Sur are part of his pilot protest.

5. After all, this Honorable Tribunal has **preferential right over the custody and revision of ballots from the Province of Camarines Sur**, including those involved in **HRET Case No. 16-024 (EP)**, pursuant to **Rule 37 of the 2010 Rules of the Presidential Electoral Tribunal (2010 PET Rules)**.

6. It must be emphasized that protestant Marcos manifested in his previous pleadings his prayer for the immediate **COLLECTION, RETRIEVAL, TRANSPORT** and **DELIVERY** of **ALL** the (a) ballot boxes and their contents, including the ballots, voter's receipts and election returns; (b) the lists of voters, particularly the Election Day Computerized Voter's List (EDCVL), and voters registration records (VRRs), and the books of voters; (c) the audit logs, transmission logs, and all log files; and (d) all other documents or paraphernalia used in the elections, including the automated election equipment and records such as the Vote Counting Machines (VCM), Consolidation and Canvass System (CCS) units, Secure Digital (SD) cards (main and back up), and other data storage devices containing electronic and ballot images, evidencing the conduct and the results of the elections in **ALL** of the protested clustered precincts of the provinces of

BASILAN, LANA O DEL SUR, MAGUINDANAO, CAMARINES SUR, ILOILO and NEGROS ORIENTAL pursuant to **Rule 37** of the **2010 PET Rules**.

7. That being the case, it is the modest submission of protestant Marcos that it is now imperative for this Honorable Tribunal to exercise its **preferential right over the custody and revision of ballots from the Province of Camarines Sur**, including those involved in **HRET Case No. 16-024 (EP)**, pursuant to **Rule 37 of the 2010 PET Rules**.

8. Concomitant thereto, this Honorable Tribunal should likewise direct the HRET to **defer the collection, retrieval and turn over** of the relevant ballot boxes containing the ballots, Voters Registration Records (VRRs)/ Book of Voters, Election Day Computerized Voters' Lists (EDCVLs) with voting records and other election documents and paraphernalia used in the protested clustered precincts of the Fourth District of Camarines Sur during the last 09 May 2016 elections.

PRAYER

ACCORDINGLY, it is most respectfully prayed of this Honorable Tribunal to **GRANT** the foregoing motion of the protestant to **EXERCISE** its **preferential right over the custody and revision of ballots from the Province of Camarines Sur**, including those involved in **HRET Case No. 16-024 (EP)**; and to further **DIRECT** the HRET to **defer the collection, retrieval and turn over** of the relevant ballot boxes containing the ballots, Voters Registration Records (VRRs)/ Book of Voters, Election Day Computerized Voters' Lists (EDCVLs) with voting records and other election documents and paraphernalia used in the protested clustered precincts of the Fourth District of Camarines Sur during the last 09 May 2016 elections.

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

Pasig City for Manila, Philippines, **21 June 2017**.

MOST LAW

(Formerly: Marcos Ochoa Serapio & Tan Law Firm)

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By:



JOSE AMOR M. AMORADO

Roll of Attorney's No. 33887

PTR No. 2495152; 01-10-17; Pasig City

IBP Lifetime Member No. 00054; Batangas

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,

Ortigas Center, Pasig City

Reg. Receipt No. RD 766 066 474 22

Ortigas Center

Pasig City

23 June 2017

THE SOLICITOR GENERAL

134 Amorsolo Street

Legaspi Village, 1229 Makati City

Reg. Receipt No. RD 766 066 465 22

Ortigas Center

23 June 2017

Marcos v. Robredo

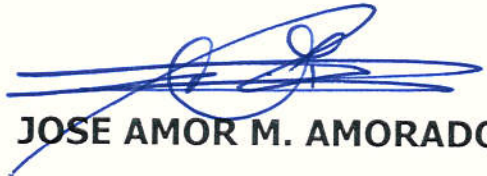
PET Case No. 005

Manifestation with Motion

4 | Page

Greetings:

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



JOSE AMOR M. AMORADO

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



JOSE AMOR M. AMORADO

AFFIDAVIT OF SERVICE

I, **ALEJANDRINO M. SANTOS**, of legal age, Filipino, and with office address at 30th floor, Tycoon Centre, Pearl Drive, Ortigas, Pasig City, after having been sworn to in accordance with law, depose and state that:

1. I am one of the liaison officers of **MOST LAW** (formerly **MARCOS OCHOA SERAPIO & TAN** law firm), counsel for protestant Ferdinand "BongBong Marcos, Jr.";

2. On 23 June 2017, I mailed copies of **MANIFESTATION with MOTION** in connection with the case entitled "Ferdinand "BongBong" Marcos Jr. vs. Maria Leonor "Leni Daang Matuwid" G. Robredo; docketed under PET Case No. 005 pending before the Presidential Electoral Tribunal, Manila by **Registered Mail** to:

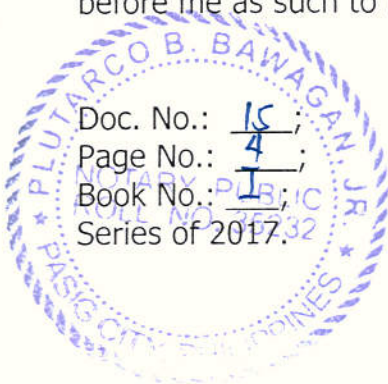
ATTY. ROMULO B. MACALINTAL c/o Sardillo Sardillo Salom Law Office Unit 802, Taipan Place F. Ortigas Avenue Ortigas Center, Pasig City	Registry Receipt No. <u>RD 766 066 97422</u> Post Office <u>Ortigas center</u> Date <u>23 June 2017</u>
THE SOLICITOR GENERAL 134 Amorsolo Street Legaspi Village, 1229 Makati City	Registry Receipt No. <u>RD 766 066 46522</u> Post Office <u>Ortigas center</u> Date <u>23 June 2017</u>


In Ortigas Center Post Office, as evidenced by the Registry Receipt hereto attached and indicated after the name of the addressees as personal service thereof is not practicable due to lack of material time.

IN WITNESS WHEREOF, I have hereunto affixed my signature this 23 June 2017 in Pasig City.


ALEJANDRINO M. SANTOS
Affiant


SUBSCRIBED AND SWORN to before me this 23 June 2017 at Pasig City, affiant exhibiting to me his Tax Identification ID No. 135-909-485 who was identified by me through competent evidence of identity to be the same person who presented the foregoing instrument and signed the instrument in my presence, and who took an oath before me as such to instrument.



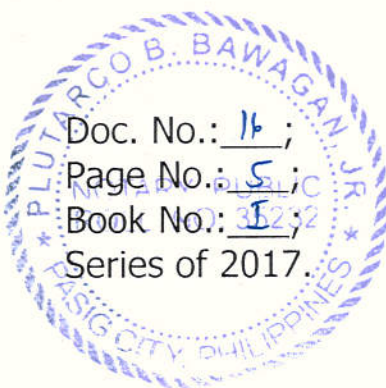

PLUTARCO B. BAWAGAN, JR.
Notary Public for and in Pasig City
30th Floor, Tycoon Center, Pearl Drive
Ortigas Center, Pasig City 1605
Commission No. 177 (2017-2018)
Attorney's Roll No. 35232
PTR No. 2495154; 01/10/17; Pasig City
IBP Lifetime No. 010398 RSM
MCLE Compliance No. V-0007923; 5/27/15

VERIFIED DECLARATION

I, **ALEJANDRINO M. SANTOS**, one of the liaison officers of the **MOST LAW** (formerly **MARCOS OCHOA SERAPIO & TAN** law firm) with office address at 30th Floor, Tycoon Centre, Pearl Drive Ortigas, Pasig City, hereby declare that the document hereto submitted electronically in accordance with the Efficient Use of Paper Rule is complete and true copy of the document "**MANIFESTATION with MOTION**" in PET Case No. 005 entitled **Ferdinand "BongBong" Marcos Jr.,** Protestant, -versus- **Maria Leonor "Leni Daang Matuwid" G. Robredo**, Protestee, filed with the Presidential Electoral Tribunal.

Signature: 
Printed Name: **ALEJANDRINO M. SANTOS**
Position: Liaison Officer
Date: 23 June 2017

SUBSCRIBED AND SWORN to before me this 23 June 2017 at Pasig City, Philippines, affiant exhibiting to me his Tax Identification No. 135-909-485. Issued by the Bureau of Internal Revenue.




PLUTARCO B. BAWAGAN, JR.
Notary Public for and in Pasig City
30th Floor, Tycoon Center, Pearl Drive
Ortigas Center, Pasig City 1605
Commission No. 177 (2017-2018)
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