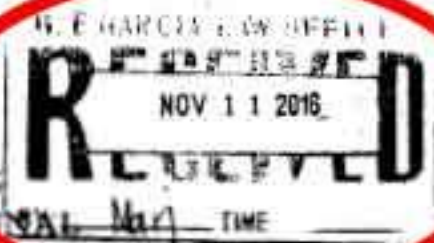


REPUBLIC OF THE PHILIPPINES  
PRESIDENTIAL ELECTORAL TRIBUNAL  
Manila



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**

The COMMISSION ON ELECTIONS, through the OFFICE OF THE SOLICITOR GENERAL, unto this Honorable Tribunal, respectfully states:

1. On 26 October 2016, the OSG received this Honorable Tribunal's Resolution dated 18 October 2016 allowing the COMELEC to file its Consolidated Comment on: (1) Protestee's *Manifestation and Compliance (on the Resolution dated 23 August 2016)* dated 15 September 2016 ("Protestee's Manifestation"), and (2) Protestant's *Comment (on the Letter dated August 16, 2016 of Atty. Jose M. Tolentino)* dated 14 September 2016 ("Protestant's Comment"), within fifteen (15) days from receipt of Protestant's Comment.

2. On 24 October 2016, the OSG received Protestant's Comment.

3. A draft of the Consolidated Comment has already been prepared by undersigned counsel. The draft of the Consolidated Comment, however, will still have to undergo internal review. More importantly, the OSG has to further confer with the COMELEC before filing the Consolidated Comment to ensure that the allegations therein are complete and accurate, and that the allegations in Protestant's Comment and Protestee's Manifestation have been sufficiently addressed.

4. For these reasons, as well as the intervening non-working holidays, undersigned counsel is unable to finalize and file the Consolidated Comment today, 8 November 2016.

5. In view of the foregoing, as well as the demands of other equally urgent professional work, the COMELEC is constrained to respectfully request for an additional period of ten (10) days from today, 8 November 2016, or until 18 November 2016, within which to file the Consolidated Comment.

**PRAYER**

WHEREFORE, the **COMMISSION ON ELECTIONS** respectfully prays that this Honorable Tribunal **GRANT** it an additional period of ten (10) days from 8 November 2016, or until 18 November 2016, within which to file its Consolidated Comment.

The COMELEC likewise prays for such further or other reliefs as may be deemed just or equitable.

Makati City for the City of Manila, 8 November 2016.

**JOSE C. CALIDA**

*Solicitor General*

Roll No. 24852

IBP Lifetime No. 015360 - 08/18/16

MCLE Exemption No. VI-000016 -9/28/16

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

  
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Roll No. 64181

IBP Lifetime No. 1033274; 4/1/16

MCLE Compliance No. V-0016027; 3/15/16

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**EXPLANATION FOR FILING AND SERVICE  
BY REGISTERED MAIL**

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

  
**JOSE ANGELO A. DAVID**