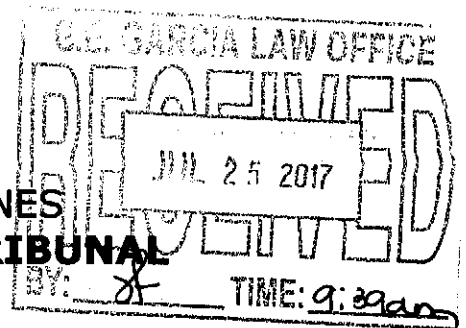


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



**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

**COMPLIANCE AND COMMENT
OF PROTESTEE MARIA LEONOR G. ROBREDO
ON LETTER DATED 26 APRIL 2017
OF ATTY. JOSE M. AMORADO**

PROTESTEE **MARIA LEONOR G. ROBREDO**, by the undersigned counsel, to the Honorable Tribunal, respectfully states:

1. On 13 July 2017, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) received copy of the Resolution dated 27 June 2017 of the Honorable Tribunal.

2. Under the Resolution, the Honorable Tribunal directed protestee Robredo to Comment on the Letter dated 27 April 2017 of Atty. Jose M. Amorado within a non-extendible period of five (5) days from notice hereof.

3. Protestee Robredo has five (5) days from 13 July 2017 or until 18 July 2017 to submit her Comment to the Letter dated 27 April 2017 of Atty. Jose M. Amorado.

4. On 16 July 2017, protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity) filed his Preliminary Conference Brief with the Honorable Tribunal.

5. In his Preliminary Conference Brief, protestant Marcos designated the following as his Pilot Provinces:

5.1. Camarines Sur;

5.2. Iloilo; and

5.3. Negros Oriental.

6. Meanwhile, the request of the Commission on Elections (COMELEC) for prior custody of the ballot boxes and its contents, other election documents and paraphernalia, and data storage devices in EPC No. 2016-37 entitled *Abdusakur Tan v. Mujiv Hataman* pertain to the provinces in the Autonomous Region of Muslim Mindanao (ARMM).

7. The three (3) pilot provinces designated by protestant Marcos for revision, recount and re-appreciation of the ballots do not include any of the provinces in ARMM.

8. There is no urgent need for the Honorable Tribunal to take prior custody of the ballot boxes and its contents, other election documents and paraphernalia, and data storage involved in EPC No. 2016-37.

9. Further, as admitted by the Honorable Tribunal, it is still in its exploratory stage on how to retrieve and collect the ballot boxes in the three (3) pilot provinces designated by protestant Marcos.

10. In fact, the Honorable Tribunal has also admitted to logistical concerns on where the recount, revision and re-appreciation of the ballots from the three (3) pilot provinces designated by protestant Marcos.

11. This logistical concern is further compounded by the lack of storage area for the ballot boxes in the three (3) pilot provinces designated by protestant Marcos.

12. More importantly, the parties have agreed during the Preliminary Conference last 11 July 2017 that the First Cause of Action, which does not involve the revision, recount and re-appreciation of the ballots, shall be resolved first by the Honorable Tribunal.

13. In the meantime, it would be unfair to the parties in EPC No. 2016-37 for its resolution be held in abeyance when there is no definite timeframe when the ballot boxes and its contents, other election documents and paraphernalia, and data storage devices in ARMM will be needed by the parties in this case.

14. Finally, the issue on whether the Second Cause of Action of protestant Marcos will be given due course by the Honorable Tribunal is still subject of the Motion for Reconsideration *Pro Tanto* filed by protestee Robredo.

15. For the reasons as cited, protestee Robredo has no objections to the request of COMELEC for prior custody of the ballot boxes and its contents, other election documents and paraphernalia, and data storage devices in EPC No. 2016-37.

16. However, should the Honorable Tribunal grant COMELEC prior custody, protestee Robredo requests that she be informed of the proceedings.

17. Protestee Robredo further asks that she be allowed to send her representatives in the collection and retrieval of the ballot boxes, and the revision, recount and re-appreciation of the ballots.

RESPECTFULLY SUBMITTED.

Pasig City for Manila. 18 July 2017.

SARDILLO SARDILLO SALOM LAW OFFICE

Collaborating Counsel for Protestee

Maria Leonor G. Robredo

Unit 802, Taipan Place, F. Ortigas Avenue,

Ortigas Center, Pasig City

02.706.4272/02.706.4273

By


MARIA BERNADETTE V. SARDILLO

Roll No. 45897

PTR No. 2362138/03 January 2017/Pasig City

IBP Lifetime No. 07133

MCLE Compliance No. V-0010907/30 September 2015

beng.sardillo@s3law.com

Copy furnished:

ATTY. GEORGE ERWIN M. GARCIA

ATTY. JOAN M. PADILLA

G. E GARCIA LAW OFFICE

Lead Counsel for Protestant

Ground Floor Laiko Building

372 Cabildo Street, Intramuros,

1002 Manila

OFFICE OF THE SOLICITOR GENERAL

134 Amorsolo Street

Legaspi Village, 1229 Makati City

COMMISSION ON ELECTIONS

Through Hon. Andres D. Bautista

Chairperson

Palacio del Gobernador,

Intramuros, Manila

ATTY. MICHAEL L. GARCIA

Acting Division Clerk

SECOND DIVISION

Election Contests and Adjudication Department

Commission on Elections

Intramuros, Manila

EXPLANATION

Due to unavailability of messengers and the distance of the parties, a copy of the herein "Comment" were sent to the above-named parties by registered mail.


MARIA BERNADETTE V. SARDILLO

Republic of the Philippines)
PASIG)

**VERIFIED DECLARATION OF COMPLIANCE WITH THE
EFFICIENT USE OF PAPER RULE**


I, **LINO B. MAPUTOL, JR.**, hereby declare that the Compliance and Comment of Protestee Maria Leonor G. Robredo On Letter dated 26 April 2017 of Atty. Jose M. Amorado submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and true copies of Compliance and Comment of Protestee Maria Leonor G. Robredo On Letter dated 26 April 2017 of Atty. Jose M. Amorado filed with the Presidential Electoral Tribunal.

Pasig City. 18 July 2017.


LINO B. MAPUTOL, JR.
Secretary
Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for Pasig City, this 18th day of July 2017 by affiant LINO B. MAPUTOL, JR. who is personally known to me, and appeared with his Driver's License ID with No. N25-11-006996 issued by Land Transportation Office, known to me as the same person who personally signed the foregoing attestation before me and acknowledged that he executed the same.

Doc. No. 332;
Page No. 47;
Book No. 17;
Series of 2017.


GAUDENCIO A. BARBOZA, JR.
NOTARY PUBLIC
Cities of Pasig, San Juan and
in the Municipality of Pateros, Metro Manila
Until December 31, 2018
PTR No. A-32/7144 / 01-03-17 Taguig City
IBP No. 1050940 / 11-08-16 RSM
ROLL No. 41989
MCLE Comp. V. 001481 / May 02, 2016
No. 11, Unit 1 Freedom Arcade Bldg.
Chaw Bldg. Sta. Lucia Antonio, Pasig City
Appointment No. 36