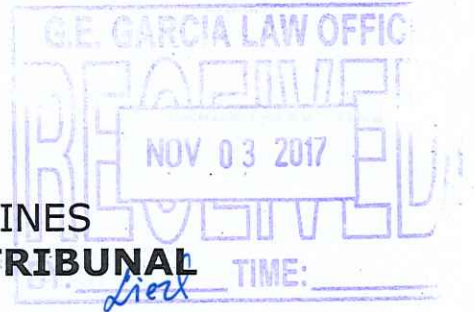


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



**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

**URGENT EX-PARTE MOTION TO BE ALLOWED TO
SECURE SOFT COPIES OF THE BALLOT IMAGES AND
OTHER REPORTS FROM THE DECRYPTED SECURED
DIGITAL CARDS**

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

1. On 20 October 2017, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) received copy of the Resolution dated 10 October 2017.

2. In the said Resolution, the Honorable Tribunal resolved to **GRANT** the request for the conduct of the decryption and printing of ballot images, etc. on 23 October 2017 at 9:00 a.m. until termination thereof, without prejudice to COMELEC's compliance in (c) above.

3. On 23 October 2017, during the briefing for the scheduled decryption of the secure digital (SD) cards, protestee Robredo was informed that all the printed ballot images and reports, together with the soft copies will be turned over to the Honorable Tribunal.

4. Hence, this Motion.

5. In lieu of the printed ballot images and reports, protestee Robredo intends to secure the soft copies of the ballot images and reports from the decrypted SD cards from the Provinces of Camarines Sur, Iloilo and Negros Oriental.

6. During the briefing on 23 October 2017, the Commission on Elections (COMELEC) assured the parties that it is able and willing to provide the parties with the soft copies provided that the Honorable Tribunal will allow it to do so.

7. Thus, it would be for the benefit of the parties that they be allowed to secure the soft copies of the ballot images and other reports from the decrypted SD cards to protect their rights and interests in this Election Protest.

8. Should the Honorable Tribunal grant this motion, protestee Robredo will coordinate with COMELEC on the procedure and supplies needed.

9. This motion is not intended for delay but dictated solely by the foregoing exigencies.

PRAYER

WHEREFORE, PREMISES CONSIDERED, it is respectfully prayed to the Honorable Tribunal that protestee Maria Leonor G. Robredo be ALLOWED to secure the soft copies of the ballot images and other reports from the decrypted Secure Digital (SD) cards.

Protestee Robredo prays for such other reliefs as may be just and equitable under the premises.

Pasig City for Manila. 23 October 2017.


ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee

Maria Leonor G. Robredo

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Philamlife Village, Las Pinas City
Telephone No. 0918-9107454

Roll No. 29040

PTR No. 11214198J/12 January 2017/Las Pinas City

IBP Lifetime No. 0724

MCLE Compliance No. V-0018139/13 April 2016

rbmacalintal@gmail.com

SARDILLO SARDILLO SALOM LAW OFFICE

Collaborating Counsel for Protestee

Maria Leonor G. Robredo

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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

REQUEST

**THE SECRETARY OF THE TRIBUNAL
PRESIDENTIAL ELECTORAL TRIBUNAL
MANILA**

Please submit the foregoing "*Urgent Ex-Parte Motion to Be Allowed to Secure Soft Copies of the Ballot Images and Other Reports from the Decrypted Secured Digital Cards*" for the consideration and approval of the Honorable Tribunal immediately upon receipt hereof without need for oral arguments.


MARIA BERNADETTE V. SARDILLO

NOTICE OF HEARING

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,

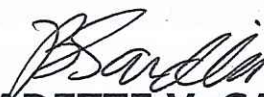
1002 Manila

OFFICE OF THE SOLICITOR GENERAL

134 Amorsolo Street

Legaspi Village, 1229 Makati City

Please take note that undersigned counsel will submit the foregoing "*Urgent Ex-Parte Motion to Be Allowed to Secure Soft Copies of the Ballot Images and Other Reports from the Decrypted Secured Digital Cards*" for the consideration and approval of the Honorable Tribunal immediately upon receipt thereof without need for further oral arguments.



MARIA BERNADETTE V. SARDILLO

Copy furnished:

ATTY. GEORGE ERWIN M. GARCIA

ATTY. JOAN M. PADILLA

G. E GARCIA LAW OFFICE

Lead Counsel for Protestant

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1002 Manila

OFFICE OF THE SOLICITOR GENERAL

134 Amorsolo Street

Legaspi Village, 1229 Makati City

EXPLANATION

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



MARIA BERNADETTE V. SARDILLO

Republic of the Philippines)
MANDALUYONG CITY)

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

I, **LINO B. MAPUTOL, JR.**, hereby declare that *URGENT EX-PARTE MOTION TO BE ALLOWED TO SECURE SOFT COPIES OF THE BALLOT IMAGES AND OTHER REPORTS FROM THE DECRYPTED SECURED DIGITAL CARDS* hereof submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and true copies of Urgent Ex-Parte Motion hereof filed with the Presidential Electoral Tribunal.

Pasig City. 24 October 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 24th day of October 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. 32;
Page No. 62;
Book No. 212;
Series of 2017.


ATTY. JOSE B. DULNUAN

NOTARY PUBLIC

FOR THE CITY OF MANDALUYONG

Until December 31, 2017

COMMISSION NO. 0458-16

IBP Lifetime No. 0016035 / Pasig City, 4-27-2017,

PTR NO. 69252527, 1-3-17, Cainta, Rizal

ROLL NO. 26304

MCLE COMR. NO. V-0022171, 6-15-16

VALID UNTIL 04-14-2019

D-22-AB GUEVENTVILLE II, 52 D.M.

GUEVARA ST., MANDALUYONG CITY

Tel No. 532-8858, 5334664

Email Add: jbdulnuan@gmail.com