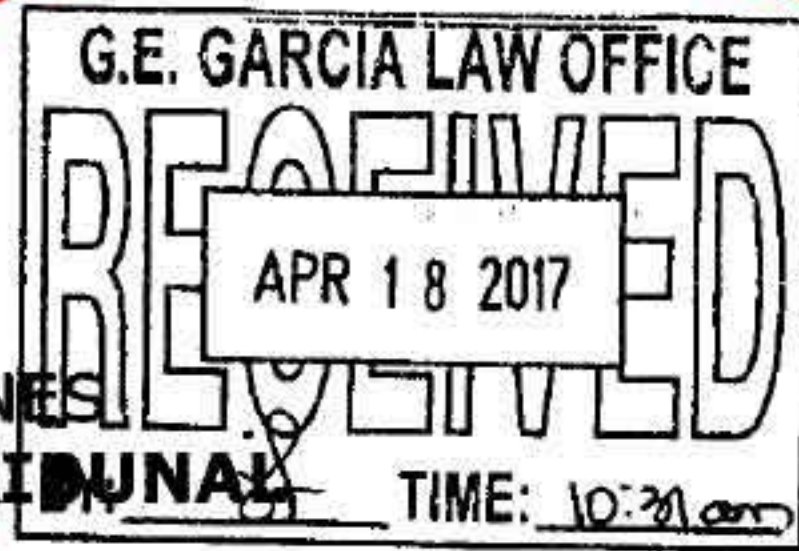


REPUBLIC OF THE PHILIPPINES  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
MANILA



**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

**MANIFESTATION**

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

1. In the Notice dated 10 March 2017, the Commission on Elections informed protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) regarding the conduct of the following closure activities:

"a) *Stripping of unused CCS Kits* - JAM Liner Warehouse, Barangay Pulong Sta. Cruz, Sta. Rosa City, Laguna beginning on 27 March 2017 until finished (Monday to Saturday), from 8:00 o'clock in the morning to 5:00 o'clock in the afternoon; *and*

b) *Back up of SD cards* - JAM Liner Warehouse, Barangay Pulong Sta. Cruz, Sta. Rosa City, Laguna beginning on 27 March 2017 until finished (Monday to Saturday), from 8:00 o'clock in the



morning to 5:00 o'clock in the afternoon.

In connection with the two (2) afore-stated activities, a briefing will be conducted at the Conference Room, 1<sup>st</sup> Floor, Building 2, JAM Liner Warehouse, Barangay Pulong, Sta. Cruz, Sta. Rosa City, Laguna on 20 March 2017 at 10:00 o'clock in the morning."

2. On 20 March 2017, or during the briefing, the Commission on Elections informed the parties that aside from the two (2) scheduled activities, it will also be conducting a stripping of the used Consolidated Canvassing System (CCS) on 31 March 2017.

3. Meanwhile, on 31 March 2017, the Commission on Elections suspended the stripping of the used CCS as certificate installed in the CCS USB tokens expired last December 2016.

4. On 30 March 2017, protestee Robredo received a Notice dated 29 March 2017 from the Commission on Elections where she was informed that:

"Notice is hereby given that the Commission suspended the CCS back-up activity last Wednesday since the Certificates of Canvass and Statistical Reports cannot be retrieved from the CCS Laptops as the certificates installed in the CCS USB tokens expired last December 2016. To address this concern, we intend to change the system date to an earlier period, preferably sometime October or November 2016. This will enable us to recover the previously mentioned files and then build a complete set of CCS back up CDs. In connection therewith, a demonstration of this procedure will be held at the **Training Room, 2<sup>nd</sup>**

**Floor, Building 2, JAM Liner Warehouse, Barangay Pulong, Sta. Cruz, Sta. Rosa City, Laguna on the 03 April 2017 at 8:30 in the morning.** Immediately after the demonstration, the Back-up of the reports stored in the CCS laptops will resume."

5. During the scheduled demonstrations, both parties, through their representatives were present.

5.1. However, protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity) asked for time to consult with his Information Technology consultants.

5.2. Meanwhile, the parties requested that the Commission on Elections furnish them with a written copy of the methodology to be used for the said activity.

5.3. Finally, upon agreement, the parties agreed to file their respective Manifestations/Comments to the Honorable Tribunal not later than 07 April 2017.

6. Hence, this Manifestation.

7. While protestee Robredo has no objections to the backing up of the CCS, she would still like to seek clarification from the Commission on Elections on the following matters:

7.1. At the onset, protestee Robredo would like to be clarified as to why these things, i.e., the expiration of the certificates in the USB tokens, are happening?

7.2. How much is being spent by the Commission on Elections on the rent of the warehouse in Sta.



Rosa, Laguna which is still being used for purposes of the closure activities.

7.2.1. By way of background, during the demonstration, it was mentioned that the Commission on Elections is still incurring expenses for their continued use of the warehouse.

7.3. Aside from the change in the date as proposed by the Commission on Elections, will the other data as contained in the CCS laptops be affected.

7.4. Finally, it would appear that the CCS laptops will not be turned over to Smartmatic but will be used by the Commission on Elections. Thus, what is the timetable for the intended use by the Commission on Elections of these CCS laptops.

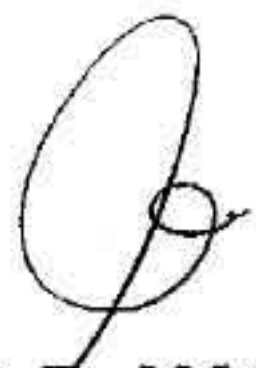
8. Protestee Robredo seeks clarification on these issues in the interest of transparency.

9. More importantly, protestee Robredo seeks to preserve the integrity of the CCS laptops if only to erase any doubts as to the legitimacy of her victory over protestant Marcos.

10. Thus, for as long as the Commission on Elections can assure that the integrity of the results of the 09 May 2016 National and Local Elections will not be affected by this proposed activity, protestee Robredo has no objections thereto and subject to the clarifications on the issues previously mentioned.

RESPECTFULLY SUBMITTED.

Pasig City for Manila. 07 April 2017.



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*Lead Counsel for Protestee*

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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

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**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

Copy furnished:

**ATTY. GEORGE ERWIN M. GARCIA**

**ATTY. JOAN M. PADILLA**

**G. E GARCIA LAW OFFICE**

*Lead Counsel for Protestant*

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372 Cabildo Street, Intramuros,

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 "Manifestation" were sent to the above-named parties by registered mail.

  
**MARIA BERNADETTE V. SARDILLO**



Republic of the Philippines )  
Pasig City )

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

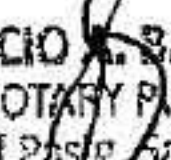
I, **KWELL SUYINN M. ZARASATE**, hereby declare that the Manifestation submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and true copies of the Manifestation filed with the Presidential Electoral Tribunal.

Pasig City. 07 April 2017.

  
**KWELL SUYINN M. ZARASATE**  
*Secretary*  
*Sardillo Sardillo Salom Law Office*

**SUBSCRIBED AND SWORN TO BEFORE ME**, a notary public in and for Pasig City, this 07th day of April 2017 by affiant **KWELL SUYINN M. ZARASATE** who is personally known to me, and appeared with her SSS ID with No. 33-9056255-6 issued by Social Security System, known to me as the same person who personally signed the foregoing attestation before me and acknowledged that she executed the same.

Doc. No. 230 ;  
Page No. 46 ;  
Book No. 09 ;  
Series of 2017.

  
**GAUDENCIO S. BARBOZA, JR.**  
NOTARY PUBLIC  
Cities of Pasig, San Juan and  
in the Municipality of Pateros, Metro Manila  
Until December 31, 2018  
PTR No. A-221744 / 03-03-17 Taguig CI  
IBP No. 1090340 / 11-08-16 RSM  
RCM No. 41969  
MCLE Comp. V. 0021481 / May 02, 2014  
No. 11, Unit 1 Freedom Arcade Bldg.  
Shaw Blvd. Brgy. San Antonio, Pasig City  
Appointment No. 26