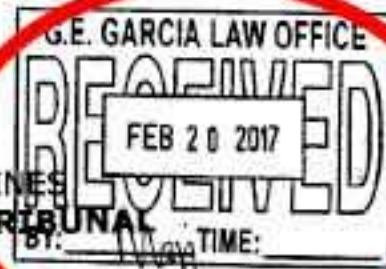


REPUBLIC OF THE PHILIPPINES  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
Manila



**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 FOR LEAVE TO BE  
ALLOWED TO SECURE COPIES OF THE BALLOT  
IMAGES, AUDIT LOG REPORTS AND ELECTION  
RETURNS FROM THE DECRYPTED SECURE DIGITAL  
CARDS**

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

1. On 02 February 2017, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) received copy of the Notice dated 31 January 2017 from the Election Records and Statistics Department (ERSD), Commission on Elections.
2. Under the Notice, the parties were notified of the scheduled decryption of the Secure Digital (SD) cards and printing of ballot images, election returns and audit logs for the twenty five (25) clustered precincts of the Municipality of Siruma, Camarines Sur on 15 February 2017.
3. Meanwhile, the Municipality of Siruma, Camarines Sur is included in the protested municipalities of protestant Ferdinand Marcos Jr. (hereafter "Marcos" for brevity).

4. For this reason, protestee Robredo seeks leave from the Honorable Tribunal that she be allowed to secure copies of the printed ballot images, election returns and audit logs from the Municipality of Siruma, Camarines Sur.

5. Further, protestee Robredo is willing to defray the costs that may be entailed relative to the printing of the ballot images, election returns and audit log reports.

6. Aside from the Municipality of Siruma, Camarines Sur, there are election protests pending in various Regional Trial Courts, Commission on Elections, House of Representatives Electoral Tribunal and Senate Electoral Tribunal.

7. Protestee Robredo seeks leave from the Honorable Tribunal that should any of the parties, trial courts and electoral tribunals request for the decryption of the SD cards involved in the contested areas, she also be allowed not only to send her representatives but be allowed to secure copies of the decrypted ballot images.

8. Finally, protestee Robredo seeks leave from the Honorable Tribunal that she be allowed, at her own expense, to secure copies of the printed ballot images, election returns and audit logs from any of the decrypted SD cards subject of both the protest and counter-protest.

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 a Resolution be issued directing the Commission on Elections and the concerned Regional Trial Courts to allow protestee Maria Leonor G. Robredo to send representatives and secure copies of the printed ballot images, election returns and audit logs from the decrypted Secure Digital Cards in the protested and counter-protested clustered precincts subject of the instant Election Protest.

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

Pasig City for Manila. 13 February 2017.

**ATTY. ROMULO B. MACALINTAL**

*Lead Counsel for Protestee*

*Maria Leonor G. Robredo*

13 Cagayan Valley Street,

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 For Leave to Be Allowed to Secure Copies of the Printed Ballot Images, Election Returns and Audit Log Reports from*

*the Decrypted Secure 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

**HON. ANDRES D. BAUTISTA**

**COMMISSION ON ELECTIONS**

Palacio del Gobernador

Intramuros, Manila

**DIRECTOR ESTER L. VILLAFLORES-ROXAS**

Election Records and Statistics Department

Commission on Elections

Intramuros, Manila

Please take note that undersigned counsel will submit the foregoing *"Urgent Ex-Parte Motion For Leave to Be Allowed to Secure Copies of the Printed Ballot Images, Election Returns and Audit Log Reports from the Decrypted Secure 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**

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Intramuros, Manila

**DIRECTOR ESTER L. VILLAFLORES-ROXAS**

Election Records and Statistics Department  
Commission on Elections  
Intramuros, Manila

#### **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**