



REPUBLIC OF THE PHILIPPINES
SENATE ELECTORAL TRIBUNAL
COA-NCR Building, Batasan Road, Quezon City

FRANCIS N. TOLENTINO,
Protestant,

SET CASE NO. 001-16

- versus -

LEILA M. DE LIMA,
Protestee.

X- - - - -X

**URGENT EX-PARTE MOTION FOR LEAVE TO BE
ALLOWED TO OBSERVE THE REVISION, RECOUNT AND
RE-APPRECIATION OF BALLOTS**

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

1. On 15 June 2017, Ma. Leonor G. Robredo (hereafter "Robredo" for brevity) learned that Honorable Tribunal scheduled the collection and retrieval of the ballot boxes from the clustered precincts in the following provinces:

- 1.1. Quezon;
- 1.2. Cebu;
- 1.3. Iloilo;
- 1.4. Maguindanao;
- 1.5. Western Samar;
- 1.6. Lanao del Norte;
- 1.7. Zamboanga del Norte;
- 1.8. North Cotabato;
- 1.9. Tawi-Tawi

- 1.10. Basilan;
- 1.11. Bulacan;
- 1.12. Pampanga;
- 1.13. Lanao del Sur; and
- 1.14. Sulu.

2. Based on the schedule by the Honorable Tribunal, the collection and retrieval of the ballot boxes commenced last 19 June 2017.

3. The identified pilot clustered precincts are also among the contested provinces in the case entitled *Ferdinand R. Marcos, Jr. v. Ma. Leonor G. Robredo* docketed as PET Case No. 005 pending before the Presidential Electoral Tribunal.

4. Movant Robredo is the protestee in the Election Protest pending before the Presidential Electoral Tribunal.

5. From the listed fourteen (14) provinces, only the Provinces of Lanao del Norte, Tawi-Tawi, Bulacan and Pampanga are not part of the Election Protest pending before the Presidential Electoral Tribunal.

6. Recently, movant Robredo learned that the revision, recount and re-appreciation of the ballots from the pilot clustered precincts will commence on 16 October 2017.

7. Hence, this Motion.

8. As aforesated, movant Robredo is also the protestee in the Election Protest pending before the Presidential Electoral Tribunal.

9. For this reason, movant Robredo seeks leave from the Honorable Tribunal to be allowed to send representatives in the scheduled revision, recount and re-appreciation of the ballots from the pilot clustered precincts.

10. Should this Motion be granted, movant Robredo intends to send the following representatives to observe the proceedings before the Honorable Tribunal:

- 10.1. Atty. Reagan de Guzman;
- 10.2. Atty. Maria Bernadette V. Sardillo;
- 10.3. Atty. Emilio Maranon III;
- 10.4. Ronnill Carlo Enriquez;
- 10.5. Aileen Tangonan;
- 10.6. Fernando Javines; and
- 10.7. Vey Brillantes.

11. Finally, movant Robredo will coordinate with the Honorable Tribunal for the issuance of the necessary identification cards.

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

PRAYER

WHEREFORE, PREMISES CONSIDERED, it is respectfully prayed of the Honorable Tribunal that a Resolution be issued ALLOWING representatives of movant Ma. Leonor G. Robredo to observe revision, recount and re-appreciation of the ballots from the pilot clustered precincts.

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

Pasig City for Quezon City. 12 October 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

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

REQUEST

**THE SECRETARY OF THE TRIBUNAL
SENATE ELECTORAL TRIBUNAL
MANILA**

Please submit the foregoing "*Urgent Ex-Parte Motion for Leave To Be Allowed to Observe the Revision, Recount and Re-appreciation of the Ballots*" 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. PACIFICO A. AGABIN
AGABIN VERZOLA & LAYAOEN
LAW OFFICES**

Counsel for Protestant Tolentino
26TH Floor, Pacific Star Building
Gil Puyat Avenue corner Makati Avenue
1200 Makati City

**ATTY. TEDDY ESTEBAN F. RIGOROSO
RIGOROSO GALINDEZ AND RABINO**

Counsel for Protestee De Lima
901 Fil Garcia Tower
140 Kalayaan Avenue
Diliman, 1101 Quezon City

G. E GARCIA LAW OFFICE

Lead Counsel for Protestant Marcos in PET Case No. 005
Ground Floor Laiko Building
372 Cabildo Street, Intramuros,
1002 Manila

Please take note that undersigned counsel will submit the foregoing "*Urgent Ex-Parte Motion for Leave To Be Allowed to Observe the Revision, Recount and Re-appreciation of the Ballots*" 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. PACIFICO A. AGABIN
AGABIN VERZOLA & LAYAOEN
LAW OFFICES**

Counsel for Protestant Tolentino
26TH Floor, Pacific Star Building
Gil Puyat Avenue corner Makati Avenue
1200 Makati City

**ATTY. TEDDY ESTEBAN F. RIGOROSO
RIGOROSO GALINDEZ AND RABINO**

Counsel for Protestee De Lima
901 Fil Garcia Tower
140 Kalayaan Avenue
Diliman, 1101 Quezon City

G. E GARCIA LAW OFFICE

Lead Counsel for Protestant Marcos in PET Case No. 005
Ground Floor Laiko Building
372 Cabildo Street, Intramuros,
1002 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