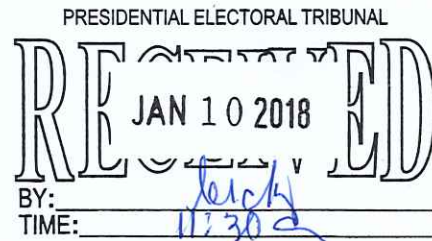


FILE COPY

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

**MOTION TO REITERATE TURNOVER OF THE
OFFICIAL, PRINTED AND AUTHENTICATED
COPIES OF THE DECRYPTED BALLOT IMAGES,
ELECTION RETURNS AND AUDIT LOGS TO THE
PROTESTANT**

Protestant **FERDINAND "BONGBONG" R. MARCOS, JR.** ("protestant Marcos"), through the undersigned counsels, unto this Honorable Presidential Electoral Tribunal ("PET"), most respectfully alleges the following:

1. On **21 November 2017**, protestant Marcos filed a Motion *to Turnover to the Protestant the Official, Printed and Authenticated Copies of the Decrypted Ballot Images, Election Returns and Audit Logs* relevant to **ALL** the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental in connection with the 9 May 2016 National and Local elections.

2. Unfortunately, despite the lapse of more than a month since its filing, the aforementioned Motion remains unacted upon by this Honorable Tribunal.

3. Consequently, protestant Marcos is now constrained to reiterate his requests for this Honorable Tribunal to direct the COMELEC-ERSD to **TURNOVER** to him the official, printed and authenticated copies of the decrypted ballot images, election returns and audit logs for **ALL** the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental relevant to the last May 2016 National and Local elections.

4. The immediate turnover of the requested documents is crucial to the election protest of Marcos as he intends to use the official, printed and authenticated copies of the decrypted ballot images, election returns and audit logs from the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental to prepare for the presentation of his evidence in this case.

PRAYER

Accordingly, it is most respectfully prayed of this Honorable Tribunal to **DIRECT** the **COMELEC-ERSD** to **TURNOVER** to the protestant **ALL** the official printed and authenticated copies of the decrypted ballot images, election returns and audit logs for **ALL** the protested clustered precincts of the pilot provinces of Camarines Sur, Iloilo and Negros Oriental.

Other reliefs, just and equitable under the premises, are also prayed for.

City of Manila, Philippines, **8 January 2018.**

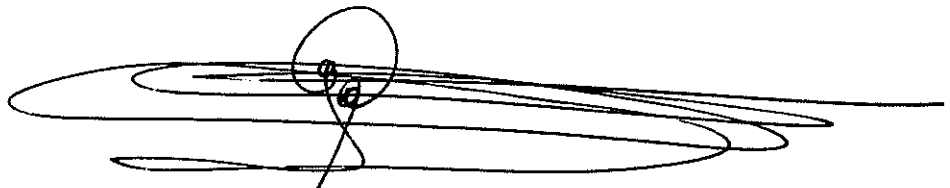
G.E. GARCIA LAW OFFICE
Lead Counsel for the Protestant
Ground Floor, LAIKO Building
Cabildo St., Intramuros, Manila 1002
Tele/Fax No. (02) 527-7261
Email: geglaw.office@gmail.com

By:

Marcos v. Robredo
PET Case No. 005

Reiterative Motion to Turnover Decrypted Images

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GEORGE ERWIN M. GARCIA

Roll of Attorneys No. 44950
PTR No. 6993946; 01-04-18; Manila
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MCLE Compliance No. V- 0011708; 11-09-15



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Roll of Attorneys No. 54079
PTR OR No. 5526177; 01-04-2018; Quezon City
IBP Lifetime Membership No. 07416; Makati Chapter
MCLE Compliance No. V-0012772; 12-15-2015

NOTICE OF SUBMISSION

THE CLERK OF THE TRIBUNAL

Presidential Electoral Tribunal
Padre Faura, Manila

ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee Robredo
c/o Sardillo Sardillo Salom Law Office
Unit 802, Taipan Place, F. Ortigas Avenue,
Ortigas Center, Pasig City

TRC # : 100581

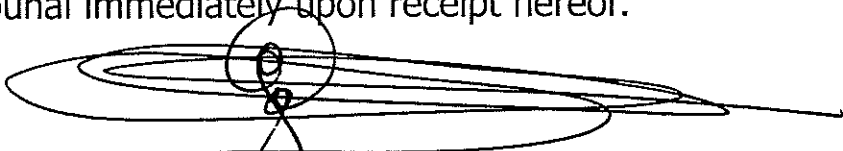
THE SOLICITOR GENERAL

134 Amorsolo Street
Legaspi Village, 1229 Makati City

TRC # : 100582

Greetings:

Please take notice that the foregoing *Motion to Reiterate Turnover of the Official, Printed and Authenticated Copies of the Decrypted Ballot Images, Election Returns and Audit Logs to the Protestant* shall be submitted for the consideration and approval of this Honorable Tribunal immediately upon receipt hereof.



GEORGE ERWIN M. GARCIA

Marcos v. Robredo
PET Case No. 005


Reiterative Motion to Turnover Decrypted Images

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EXPLANATION

[Pursuant to Rule 30 and 31 of the PET Rules in relation to Section 11, Rule 13 of the 1997 Rules of Civil Procedure]

Copies of the foregoing *Motion to Reiterate Turnover of the Official, Printed and Authenticated Copies of the Decrypted Ballot Images, Election Returns and Audit Logs to the Protestant* were served to the above-mentioned parties by registered mail, personal service being impractical due to distance, time and manpower constraints.



GEORGE ERWIN M. GARCIA

AFFIDAVIT OF SERVICE

(Revised as of April 1, 1994)

I, **Jerry C. Guevarra**, a clerk of the G.E. GARCIA Law Office with office address at Ground Floor, LAIKO Bldg., Cabildo St., Intramuros, City of Manila, after being duly sworn, do hereby depose and say:

That on January 10, 2018, I served a copy of the following pleading/paper.

NATURE OF PLEADING/PAPER

"MOTION TO REITERATE TURNOVER OF THE OFFICIAL, PRINTED AND AUTHENTICATED COPIES OF THE DECRYPTED BALLOT IMAGES, ELECTION RETURNS AND AUDIT LOGS TO THE PROTESTANT"

In **PET Case No. 005** entitled "**FERDINAND 'BONGBONG' R. MARCOS, JR., Protestant, -versus- MARIA LEONOR 'LENI DAANG MATUWID' G. ROBREDO, Protestee**", pursuant to Sections 3, 4, 5 and 10, Rule 13 of the Rules of Court, as follows:

By Registered Mail:

R. R. Nos.

ATTY. ROMULO B. MACALINTAL
c/o Sardillo Sardillo Salom Law Office
Unit 802, Taipan Place, F. Ortigas Avenue
Ortigas Center, Pasig City

100581

THE SOLICITOR GENERAL
134 Amorsolo Street
Legaspi Village, 1229 Makati City

100582

By depositing a copy at the post office in Manila, as evidenced by Registry Receipt(s) No(s) and indicated after the name(s) of the addressee(s), and with instructions to the postmaster to return the mail to the sender after ten (10) days if undelivered.

January 10, 2018, Manila, Philippines.

JERRY C. GUEVARRA
Affiant

JAN 10 2018

SUBSCRIBED AND SWORN to before me this _____ at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

ATTY. LLOYD ALLAIN A. CUDAL
NOTARY PUBLIC

UNTIL DECEMBER 31, 2018

PTR NO. 6772224-12-27-17/MLA.

IBP NO. 1022378 QC. 12-02-16

Notarial Commission No. 2017-097

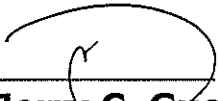
ROLL NO. 52809

MCLE No. V-0007952 08-20-2015

Doc. No. 2018
Page No. 600
Book No. 1
Series of 2018.

VERIFIED DECLARATION

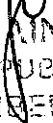
I, **JERRY C. GUEVARRA**, a clerk of the G.E. GARCIA Law Office with office address at Ground Floor, LAIKO Bldg., Cabildo St., Intramuros, City of Manila, hereby declare that the document/s (and annexes thereof) hereto submitted electronically in accordance with the Efficient use of Paper Rule is/are complete and true copy/ies of the document/s **"MOTION TO REITERATE TURNOVER OF THE OFFICIAL, PRINTED AND AUTHENTICATED COPIES OF THE DECRYPTED BALLOT IMAGES, ELECTION RETURNS AND AUDIT LOGS TO THE PROTESTANT"** in PET Case No. 005 entitled **FERDINAND 'BONGBONG' R. MARCOS, JR., Protestant, -versus- MARIA LEONOR 'LENI DAANG MATUWID' G. ROBREDO, Protestee,** filed with the Presidential Electoral Tribunal.

Signature: 
Printed Name: **Jerry C. Guevarra**
Position: Staff
Date: January 10, 2018

SUBSCRIBED AND SWORN to before me this JAN 10 2018 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Person Administering Oath

Doc. No. 2077 ;
Page No. 60 ;
Book No. I ;
Series on 2018.


ATTY. LLOYD ALLAN A. CUDAL
NOTARY PUBLIC
UNTIL DECEMBER 31, 2018
PTR NO. 6772224-12-27-17/MLA.
IBP NO. 1022378 DC. 12-02-16
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