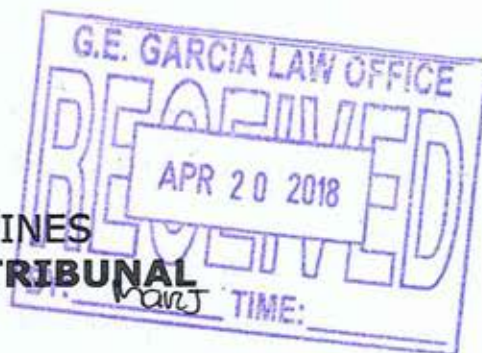


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



**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

SECOND MANIFESTATION OF GRAVE CONCERN

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

1. On 12 April 2018, various media outlets reported that the Urgent Ex-Parte Motion to Direct the Head Revisors to Apply the Correct Threshold Percentage as Set by the Commission on Elections in the Revision, Recount and Re-Appreciation of the Ballots, in Order to Expedite the Proceedings dated 05 April 2018 ("Ex-Parte Motion") filed by protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) was denied by the Honorable Tribunal.

2. At that time, protestee Robredo has yet to receive a copy of the said Resolution.

3. Meanwhile, on 13 April 2018, at the start of the revision of the ballots, one of the lawyers of protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity), Atty. Joan Padilla, entered the revision area.

4. Instead of merely observing the revision proceedings, Atty. Padilla started going around the revision

committees and asked the Head Revisors to implement the fifty percent (50%) threshold percentage.

5. Worse, without any authority from the Honorable Tribunal, Atty. Padilla was also heard as informing the Head Revisors that she no longer wants the Revision Committees to check the votes of the parties vis-à-vis the Election Returns.

6. To further compound matters, without any authority from the Honorable Tribunal, Atty. Padilla asked the Revision Supervisors of the Honorable Tribunal to post in every corner or table in the revision area a copy of the Resolution dated 10 April 2018 which denied the Ex-Parte Motion of protestee Robredo.

7. It was only when the attention of the Supervisors of the Honorable Tribunal was called that Atty. Padilla stopped.

8. All these can be confirmed by a review of the CCTV footage in the revision area.

9. During the briefing, the counsels were verbally informed by the representatives of the Honorable Tribunal that the revision proceedings are akin to court proceedings.

10. For this reason, the representatives of the parties were adviced to behave with proper decorum and observe the proper attire.

11. Atty. Padilla is first and foremost an officer of the court.

12. Her conduct during the revision on 13 April 2018 is unbecoming of an officer of the court.

13. The action of Atty. Padilla is a clear sign of the desire of protestant Marcos to win at all costs, fair or foul, by disenfranchising innocent legitimate voters who are not aware of the technicalities and in utter disregard of existing

jurisprudence and rules in revision that the will of the voter shall be given effect setting aside any technicalities.

14. Knowing fully well that protestee Robredo overwhelmingly won in Camarines Sur, protestant Marcos and his counsel, in callous disregard of the voter's will would do everything possible just to whittle down the votes validly received by protestee Robredo.

15. What is very surprising, if not sad, is for Atty. Padilla, who has been in election law practice for several years now, to perpetuate an act which she herself will condemn or had condemned in election cases she handled with similar incidents.

16. What a shame for an election law practitioner to do such a thing just to satisfy her client.

17. And, what a disgrace for a client that is protestant Marcos to give his imprimatur to such an unethical act of his lawyer.

18. Her conduct not only disrupted the proceedings but can be construed as unduly influencing the representatives of the Honorable Tribunal.

19. If Atty. Padilla felt that there was any lapse in the implementation of the Rules, she could have availed of the appropriate remedies with the Honorable Tribunal.

20. The action of Atty. Padilla merely confirms that the application of the fifty percent (50%) threshold percentage is material at this stage of the proceedings as it gives the false impression that protestant Marcos is making a substantial recovery.

21. Her actions showed disrespect to the Honorable Tribunal and the representatives of the parties.

RESPECTFULLY SUBMITTED.
Pasig City for Manila. 16 April 2018.



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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