

REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
MANILA



FERDINAND R. MARCOS, JR.,
Protestant,

PET Case No. 005

- versus -

MARIA LEONOR G. ROBREDO,
Protestee.

X- - - - - X

MOTION TO WITHDRAW ANY AND ALL
PENDING MOTIONS WHICH MAY DELAY
RECOUNT PROCEEDINGS

PROTESTEE, through counsel, and to this Honorable Tribunal respectfully alleges:

1. In recent media releases of the protestant, he asked the protestee to sign and file a joint motion "withdrawing all our outstanding motions so we could go straight to the recount (so) we could hasten the process and go straight to the ballots. The ballots are the best evidence and we should just proceed with the recount,"¹

2. While protestee has no such pending motions nor is she aware that she has any pending motion which could or would delay or hamper the recount processes, she respectfully manifests and so moves before this Honorable Tribunal that if there exists in the records of the Tribunal any such motion, the same should be considered as duly abandoned or withdrawn.

3. Meanwhile, protestee asks that the Resolution of the Honorable Tribunal allowing her to secure the soft copies of the ballot images be enforced.

¹ Bongbong dares Leni: Proceed to recount- By Paolo Romero (The Philippine Star) | Updated February 5, 2018 - <http://www.philstar.com/headlines/2018/02/05/1784697/bongbong-dares-leni-proceed-recount>; Marcos dares Robredo: Withdraw all motions to hasten poll case ... newsinfo.inquirer.net/.../breaking-news-ferdinand-marcos-bongbong-marcos-leni-rob..

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

PRAYER

WHEREFORE, it is respectfully that if there is any pending motion of the protestee which may delay the recount proceedings the same should be considered as WITHDRAWN or ABANDONED.

Other reliefs just and equitable are likewise prayed for.

February 8, 2018. Pasig City for Manila.

ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee

Maria Leonor G. Robredo

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MCLE Compliance No. V-0018139/13 April 2016

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REQUEST

**THE SECRETARY OF THE TRIBUNAL
PRESIDENTIAL ELECTORAL TRIBUNAL
MANILA**

Please submit the foregoing "*Motion to Withdraw Any and All Pending Motions which May Delay Recount Proceedings*" for the consideration and approval of the Honorable Tribunal immediately upon receipt hereof without need for oral arguments.

ATTY. ROMULO B. MACALINTAL

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

Please take note that undersigned counsel will submit the foregoing “*Motion to Withdraw Any and All Pending Motions which May Delay Recount Proceedings*” for the consideration and approval of the Honorable Tribunal immediately upon receipt thereof without need for further oral arguments.


ATTY. ROMULO B. MACALINTAL

Copy furnished:

ATTY. GEORGE ERWIN M. GARCIA

ATTY. JOAN M. PADILLA

G. E GARCIA LAW OFFICE

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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.


ATTY. ROMULO B. MACALINTAL