



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 OMNIBUS MOTION FOR (1)
CLARIFICATION (ON THE RESOLUTION DATED 05
DECEMBER 2017);
AND (2) TO ALLOW PARTIES AND THEIR
REPRESENTATIVES TO BE PRESENT DURING THE
INVENTORY PRIOR TO TRANSPORT TO THE
DESIGNATED STAGING AREA/HUB**

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

1. On 22 December 2017, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) received copy of the Resolution dated 05 December 2017.

2. In the said Resolution, the Honorable Tribunal resolved to:

"(b) **DIRECT** all City and Municipal Treasurers and Election Officers to **DELIVER** to the PET Retrieval Team at

the designated staging area/hub at the Camarines Sur Convention Center, Capitol Complex, Cadlan, Pili, Camarines Sur, or if the Convention Center is not available, at the Freedom Sports Complex of the Department of Education, Region V, Division of Camarines Sur, all the ballot boxes and their contents with their keys, if with locks; voter's receipts (if not included inside or with the ballot boxes); list of voters, particularly the EDCVL; VRRs; and book of voters and other election documents and paraphernalia used in the 2016 National and Local Elections, regardless of the pendency of any election protest or election related case before the House of Representatives Election Tribunal, Senate Electoral Tribunal, Commission on Elections or any trial court, based on the schedule below:

January 23, 2018 (Tuesday)	January 24, 2018 (Wednesday)	January 25, 2018 (Thursday)	January 26, 2018 (Friday)
Cabusao	Naga City	Tigaon	Baao
Sipucot	Camaligan	Lagonoy	Balatan
Lupi	Calabanga	Tinambac	Bato
Ragay	Bombon	Siruma	Buhi
Del Gallego	Canaman	Presentacion	Bula
Libmanan	Magarao	Garchitorea	Iriga City
Pamplona	Ocampo	Caramoan	Nabua
Pasacao	Pili	San Jose	
San Fernando		Sagnay	
Milaor		Goa	
Gainza			
Minalabac			

(c) **DIRECT** the Regional Trial Court judges before whom any election protest involving the clustered precincts of the Municipalities of Siruma and Calabanga are pending to **RELEASE** to the PET

Retrieval Team in Camarines Sur, under proper receipt and with notice to the parties, the ballot boxes and their contents with their keys, if with locks; voter's receipts (if not included inside or with the ballot boxes); list of voters, particularly the EDCVL; VRRs and books of voters and other election documents and paraphernalia used in the 2016 National and Local Elections based on the above schedule;"

3. Hence, protestee Robredo is constrained to seek a clarification on the procedure for the collection and retrieval of the ballot boxes, election documents and paraphernalia in the protested clustered precincts in the Province of Camarines Sur.

4. Based on the said Resolution of the Honorable Tribunal, it would appear that the respective Municipal Treasurers and Election Officers will merely deliver the ballot boxes, election documents and paraphernalia to the PET Retrieval Team based on the schedule as provided.

5. However, in doing so, the parties will not be able to see the original state of the ballot boxes in its storage.

6. Consequently, representatives of the parties will not be able to write down their observations and comments during the inventory of the ballot boxes, election documents and paraphernalia while at their storage.

7. More importantly, the parties will not be able to verify the completeness of the ballot boxes and the correctness of the items being collected and retrieved.

8. Finally, the presence of the parties during the inventory of the ballot boxes, election documents and paraphernalia will enable them to make a preliminary observation as to its state, i.e., the condition of the ballot boxes, locks and seals prior to the retrieval.

9. Thus, for purposes of transparency, protestee Robredo asks that the parties be allowed to:

9.1. Be present during the inventory of the ballot boxes, election documents and paraphernalia prior to its transport to the designated staging area/hub;

9.2. Escort/Accompany the ballot boxes, election documents and paraphernalia from their respective storage while being transported to the designated staging are/hub; and

9.3. Thereafter, be allowed to escort/accompany the ballot boxes, election documents and paraphernalia from their respective storage while being transported to from designated staging are/hub to the Supreme Court-Court of Appeals Gymnasium, Supreme Court Compound, Ermita, Manila.

10. 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:

1. CLARIFYING the Resolution dated 05 December 2017;


2. ALLOWING the parties and their representatives to be present during the inventory at the storage;

3. Thereafter, ALLOWING the parties to escort/accompany the ballot boxes, election documents and paraphernalia from the storage to the designated staging area/hub; and

4. Finally, ALLOWING the parties to escort/accompany the ballot boxes during its transport from the designated staging area/hub to the Supreme Court-Court of Appeals Gymnasium, Supreme Court Compound, Ermita, Manila.

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

Pasig City for Manila. 03 January 2018.



ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee

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By



MARIA BERNADETTE V. SARDILLO

Roll No. 45897

PTR No. 3474221/03 January 2018/Pasig City

IBP Lifetime No. 07133

MCLE Compliance No. V-0010907/30 September 2015

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REQUEST

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

Please submit the foregoing *"Urgent Omnibus Motion (1) For Clarification (on the Resolution dated 05 December 2017); and (2) For the Parties and their Representatives to be Present During the Inventory Prior to Transport to the Designated Staging Area/Hub"* 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
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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 "*Urgent Omnibus Motion (1) For Clarification (on the Resolution dated 05 December 2017); and (2) For the Parties and their Representatives to be Present During the Inventory Prior to Transport to the Designated Staging Area/Hub*" 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:

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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.


MARIA BERNADETTE V. SARDILLO

Republic of the Philippines)
PASIG CITY)

**VERIFIED DECLARATION OF COMPLIANCE WITH THE
EFFICIENT USE OF PAPER RULE**

I, **CHARLOTTE S. TORIO**, hereby declare that the


**URGENT OMNIBUS MOTION
FOR (1) CLARIFICATION (ON THE RESOLUTION
DATED 05 DECEMBER 2017);
AND (2) TO ALLOW PARTIES AND THEIR
REPRESENTATIVES TO BE PRESENT DURING THE
INVENTORY PRIOR TO TRANSPORT TO THE
DESIGNATED STAGING AREA/HUB**

Pasig City, 4th of January 2018.


CHARLOTTE S. TORIO
Secretary
Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for Pasig City, this 4th day of January 2018 by affiant CHARLOTTE S. TORIO who is personally known to me, and appeared with his SSS ID with NO. 33-5004340-0 issued by SSS Office, known to me as the same person who personally signed the foregoing attestation before me and acknowledged that he executed the same.

Doc. No. 428 ;
Page No. 88 ;
Book No. 1 ;
Series of 2018.


AIRA KRISTINA M. ALLAS
Notary Public for the Cities of Pasig and San Juan
and in the Municipality of Pateros
Notarial Commission No. 114 (2017-2018)
Until December 31, 2018
Roll No. 86318
IBP Lifetime Roll No. 018026
PTR No. 2495080 ; 01/05/17 ; Pasig City
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