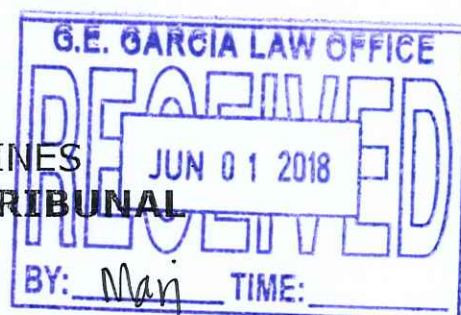


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



**FERDINAND "BONGBONG" R.
MARCOS,**

Protestant,

-versus -

PET Case No. 005
For: Election Protest
Vice-President

**MARIA LEONOR "LENI DAANG
MATUWID" G. ROBREDO,**

Protestee.

X- - - - - X

MOTION FOR ADDITIONAL TIME

The **COMMISSION ON ELECTIONS**, through the **OFFICE OF THE SOLICITOR GENERAL**, and unto this Honorable Tribunal, respectfully states that:

1. On 24 April 2018, this Honorable Tribunal issued a Resolution requiring the COMELEC, among others, to comment, within ten (10) days from notice of Resolution, on Protestee Robredo's *Urgent Motion for Reconsideration (of the Resolution dated April 10, 2018) with Reiterative Prayer to Immediately Direct the Head Revisors to Use the Twenty-Five (25%) Threshold Percentage in the Revision, Recount and Re-appreciation of Ballots* dated 18 April 2018 ("Motion").

2. Undersigned counsel received notice of said Resolution on 17 May 2018. Considering that the last day for the filing of the Comment falls on 27 May 2018, a Sunday, the COMELEC has until today, the next working day, within which to comply with this Honorable Tribunal's Resolution.

3. Undersigned counsel is conferring with the COMELEC with regard to its position on the matter raised in Protestee Robredo's Motion. Considering, however, the post-

MOTION FOR ADDITIONAL TIME

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election activities being conducted by the COMELEC in relation to the 14 May 2018 Barangay and SK Elections, the COMELEC is unable to file its Comment today.

4. For this reason, and considering as well the demands of other equally important and urgent professional work, including court appearances, meetings, and the drafting of equally urgent pleadings, undersigned counsel is constrained to ask this Honorable Tribunal for an additional period of fifteen (15) days within which to file its Comment on Protestee Robredo's Motion.

5. This motion is being filed for the above-stated reasons and is not intended to delay the proceedings.

PRAYER

WHEREFORE, it is respectfully prayed that the Honorable Tribunal **GRANT** the COMELEC an extension of fifteen (15) days from **27 May 2018**, or until **11 June 2018**, within which to file its Comment on Protestee Robredo's Motion.

Other relief just and equitable under the premises are likewise prayed for.

Makati City for the City of Manila, 28 May 2018.

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Solicitor General

Roll No. 24852

IBP Lifetime No. 015360, 8/18/16

MCLE Exemption No. VI-000016, 9/28/16

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COMMISSION ON ELECTIONS

Intramuros, 1002 Manila

EXPLANATION

In compliance with Section 11, Rule 13 of the Rules of Court, counsel respectfully manifests that the foregoing **MOTION** will be served by registered mail because of distance constraints, as well as the limited number of office messengers, which make personal service thereof impracticable.



LEONARDO V. CALDERON III
Associate Solicitor