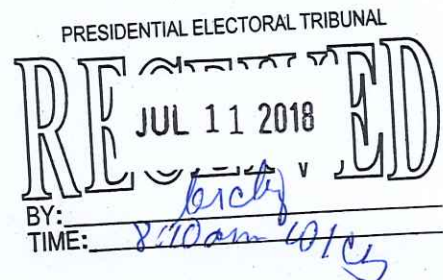


**REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila**

**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

**COUNTER-MANIFESTATION WITH MOTION TO
RELEASE CCTV FOOTAGE OF THE REVISOR OF
PROTESTANT FERDINAND R. MARCOS, JR.**

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

1. Protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity) was less than candid to the Honorable Tribunal.

2. Once more, protestant Marcos portrays himself as the victim at the expense of protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity).

3. On 09 July 2019, protestant Marcos filed a Manifestation of Grave Concern with Extremely Urgent Motion to Investigate [RE: PET Head Revisors and Other PET Personnel Fraternizing with Protestee's Revisor] ("Manifestation") of even date.

4. The Manifestation was signed by no less than

5. In his Manifestation, protestant Marcos claimed that he was *dismayed and tremendously demoralized*.

5.1. Protestant Marcos further claimed that the judicial recount and revision proceeding may already be compromised.

5.2. Finally, to bolster his malicious claim, protestant Marcos claimed that *it is highly plausible that the camp of the protestee, through her party revisor Abuyuan, already infiltrated and curried favor with these PET personnel in order to manipulate, influence and/or control the revision proceedings and maneuver the revision results in her favor*.

6. However, protestant Marcos conveniently omitted that:

6.1. Days prior thereto, the revisors of protestant Marcos were well aware of the proposed outing.

6.2. The revisors of protestant Marcos were also invited to the said outing.

6.3. In fact, prior thereto, no less than one of the supervisors of protestant Marcos, Mr. Roderick Miranda, sent some snacks for the proposed outing.

6.4. A closed circuit television (CCTV) footage will confirm Mr. Miranda leaving the bag of snacks in the fourth (4th) floor of the building.

6.5. Finally, an investigation has already been conducted where some of the personalities involved were already meted with penalties.

7. Surprisingly, notwithstanding these, protestant Marcos still filed his Manifestation.

8. Protestant Marcos and his revisors were well aware of the said outing as they were invited as well.

9. Surprisingly, it is only after more than two (2) weeks that protestant Marcos is asking for an investigation.

10. Protestant Marcos is asking for an investigation despite being fully aware that the Honorable Tribunal already conducted one.

11. Worse, protestant Marcos feigns ignorance when by the actions of his own revisor, they were not only fully aware but acquiesced to the said outing by giving snacks.

12. Protestant Marcos conveniently omitted these facts in order to suit his narrative that he was a victim during the 09 May 2016 National and Local Elections.

13. Inasmuch as we empathize with protestant Marcos in losing the Vice-Presidential race, he should be more candid to the Honorable Tribunal.

14. The Honorable Tribunal deserves no less than the truth from protestant Marcos.

15. Thus, if only to confirm that the revisors of protestant Marcos were not only aware, but even donated snacks to the outing, the CCTV footage must be released.

16. This way the name of protestee Robredo and her revisor will be cleared from the unjust and malicious accusation made by protestant Marcos in his Manifestation.

17. 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 ALLOWING the release of the Closed Circuit Television (CCTV) footage of Mr. Roderick Miranda leaving a bag of snacks prior to 22 June 2018 be RELEASED.

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

Pasig City for Manila. 10 July 2018.


ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee

Maria Leonor G. Robredo

13 Cagayan Valley Street,
Philamlife Village, Las Pinas City

Telephone No. 0918-9107454

Roll No. 29040

PTR No. 11437242J/10 January 2018/Las Pinas City

IBP Lifetime No. 0724

MCLE Compliance No. V-0018139/13 April 2016

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SARDILLO SARDILLO SALOM LAW OFFICE

Collaborating Counsel for Protestee

Maria Leonor G. Robredo

Unit 802, Taipan Place, F. Ortigas Avenue,

Ortigas Center, Pasig City

02.706.4272/02.706.4273

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

beng.sardillo@s3law.com

REQUEST

THE SECRETARY OF THE TRIBUNAL PRESIDENTIAL ELECTORAL TRIBUNAL MANILA

Please submit the foregoing "*Urgent Motion to Release the CCTV Footage of the Revisor of Protestant Ferdinand R. Marcos, Jr.*" 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
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 "*Urgent Motion to Release the CCTV Footage of the Revisor of Protestant Ferdinand R. Marcos, Jr.*" 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:

ATTY. GEORGE ERWIN M. GAR
ATTY. JOAN M. PADILLA
G. E GARCIA LAW OFFICE
Lead Counsel for Protestant
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134 Amorsolo Street
Legaspi Village, 1229 Makati City

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NO

RD 965 542 019 ZZ

Letter/Package No. _____

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10 JUL 2018

Postmaster/Teller

PHILIPPINES

NO

RD 965 542 022 ZZ

Post Office _____

Letter/Package No. _____

Posted on _____ 20

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10 JUL 2018

Postmaster/Teller

PHILIPPINES

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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.

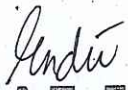

MARIA BERNADETTE V. SARDILLO

Republic of the Philippines)
MANDALUYONG CITY)

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

I, **LAILA T. ENDIC**, hereby declare that the Counter-Manifestation with Motion to Release CCTV Footage of the Revisor of Protestant Ferdinand R. Marcos, Jr. submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and are true copies of the Counter-Manifestation with Motion to Release CCTV Footage of the Revisor of Protestant Ferdinand R. Marcos, Jr. filed with the Presidential Electoral Tribunal.

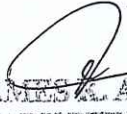
Pasig City. 10 July 2018.


LAILA T. ENDIC
Secretary

Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for ^{MANDALUYONG CITY} Pasig City, this 10th day of July 2018 by affiant **LAILA T. ENDIC** who is personally known to me, and appeared with her SSS ID with NO. 3438031871 issued by Social Security System Office, known to me as the same person who personally signed the foregoing attestation before me and acknowledged that she executed the same.

Doc. No. 56 ;
Page No. 12 ;
Book No. 90 ;
Series of 2018.


Y. JAMES L. ABUGAN
NOTARY PUBLIC
Until Dec. 31, 2018
IBP No. 021498/1-5-2018
Rizal Chapter
Roll No. 26890
MCLE No. V-0004484-10/31/2014
PIR # 3369955 - 01/05/2018
Mandaluyong City
TIN # 116-239-956
Tel. 631-40-90

Republic of the Philippines)
MANDALUYONG CITY)S.S.

AFFIDAVIT OF SERVICE

I, **TEODERICO A. MESA**, as Liaison Officer of **SARDILLO SARDILLO SALOM LAW OFFICE**, with postal address at Unit 802 The Taipan Place, F. Ortigas Junior Road, Ortigas Center, Pasig City after being duly sworn depose and say:

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

COUNTER-MANIFESTATION WITH MOTION TO RELEASE CCTV FOOTAGE OF THE REVISOR OF PROTESTANT FERDINAND R. MARCOS, JR.

In **PET CASE No. 005 For Election Protest**, entitled, **FERDINAND "BONGBONG R. MARCOS, JR., Protestant vs 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:

ATTY. GEORGE ERWIN M. GARCIA
ATTY. JOAN M. PADILLA
G. E GARCIA LAW OFFICE

Counsel for Protestant
Ground Floor Laiko Building
372 Cabildo Street, Intramuros,
1002 Manila

- RD 965 542019 ZZ

OFFICE OF THE SOLICITOR GENERAL
134 Amorsolo Street
Legaspi Village, 1229 Makati City
Commission on Elections

- RD 965 542022 ZZ

By depositing copies on 10th day of July 2018 in the PO
at Pasig City as evidenced by Registry Receipt Nos.
 , and are hereto attached and indicated
after the name of the addressees and with instructions to
the postmaster to return the mail to the sender after ten
(10) days if undelivered.

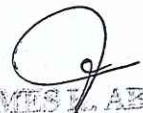
IN WITNESS WHEREOF, I have hereunto set my hand
this 10th day of July 2018 at .

MANDALUYONG CITY

TEODERICO A. MESA
Affiant

SUBSCRIBED AND SWORN to before me this 10th day
of July 2018, at MANDALUYONG CITY by **TEODERICO A. MESA**,
who has satisfactorily proven to me his identity through his
valid SSS No. 33-5698806-4, who personally signed
before me the foregoing Affidavit of Service and
acknowledged that he executed the same.

Doc. No. 59;
Page No. 12;
Book No. 90;
Series of 2018


ATTY. JAMES L. ABUGAN
NOTARY PUBLIC
Until Dec. 31, 2018
IBP No. 021498/ 1-5-2018
Rizal Chapter
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