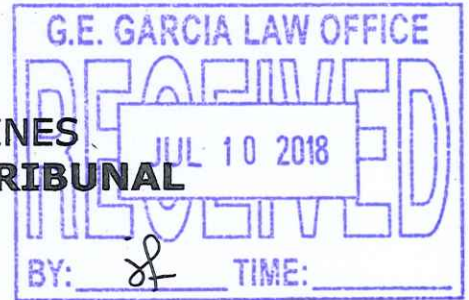


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



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 EX-PARTE MOTION TO DIRECT
ATTY. VIC RODRIGUEZ TO DISCLOSE THE NAMES OF
PERSONS IN THE REVISION AREA WHO WERE AWARE
OF THE USE OF THE PLASTIC MAGNIYING GLASS**

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

1. On 20 June 2018, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) filed a Third Manifestation of Grave Concern of even date.

2. In her Manifestation, protestee Robredo informed the Honorable Tribunal regarding an incident on 14 June 2018 in the revision area.

3. On 14 June 2018, Mr. Nestor Borromeo, a revisor for protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity) was caught using a plastic magnifying lens.

4. In response thereto, protestant Marcos, through his spokesperson, Atty. Vic Rodriguez issued a statement to the media that *other people on the revision floor were*

*aware that the plastic magnifier was being used and never complained.*¹

5. The statement of Atty. Rodriguez is clear that some personalities inside the revision area were complicit in the actions of Mr. Borromeo.

6. Plainly speaking, these persons, fully aware that the use of magnifying lens is prohibited, allowed Mr. Borromeo to not only bring the said item inside the revision area but worse, use it as well.

7. Meanwhile, on 03 July 2018, protestee Robredo received a copy of the Resolution dated 26 June 2018 directing *Mr. Nestor Borromeo, revisor for protestant, to explain within five (5) days from notice hereof why his accreditation as party revisor should not be withdrawn.*

8. Thus, to unearth the truth and serve as guide in resolving the said incident, Atty. Rodriguez should be directed to inform the Honorable Tribunal who these "other people" are who were aware of the use of the plastic magnifying lens inside the revision area.

9. Atty. Rodriguez, a lawyer and an officer of the court, has a responsibility to guide the Honorable Tribunal in determining the truth.

10. More importantly, this will dispel any wrong information being fed to the media and the public regarding this Election Protest.

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

¹[http://www.manilatimes.net/robredo-hit-for-complaining-over-magnifying-glass-in-vp-recount/412533/;](http://www.manilatimes.net/robredo-hit-for-complaining-over-magnifying-glass-in-vp-recount/412533/)
[http://www.gmanetwork.com/news/news/nation/657969/robredo-desperate-to-delay-vp-polls-recount-bongbong-camp/story/;](http://www.gmanetwork.com/news/news/nation/657969/robredo-desperate-to-delay-vp-polls-recount-bongbong-camp/story/)
<https://www.rappler.com/nation/205511-robredo-manifestation-nestor-borromeo-vp-recount> last accessed on 03 July 2018

PRAYER

WHEREFORE, PREMISES CONSIDERED, it is respectfully prayed to the Honorable Tribunal that a Resolution be issued DIRECTING Atty. Vic Rodriguez, spokesperson of protestant Ferdinand R. Marcos, Jr. to name the persons who were complicit in the use of the plastic magnifying lens inside the revision area.

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

Pasig City for Manila. 04 July 2018.



ATTY. ROMULO B. MACALINTAL

Lead Counsel for Protestee

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REQUEST

THE SECRETARY OF THE TRIBUNAL PRESIDENTIAL ELECTORAL TRIBUNAL MANILA

Please submit the foregoing "*Urgent Ex-Parte Motion to Direct Atty. Vic Rodriguez to Disclose the Names of Persons in the Revision Area Who Were Aware of the Use of the Plastic Magnifying Lens*" for the consideration and approval of the Honorable Tribunal immediately upon receipt hereof without need for oral arguments.



ATTY. ANTONIO CARLOS B. BAUTISTA

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 Ex-Parte Motion to Direct Atty. Vic Rodriguez to Disclose the Names of Persons in the Revision Area Who Were Aware of the Use of the Plastic Magnifying Lens*" for the consideration and approval of the Honorable Tribunal immediately upon receipt thereof without need for further oral arguments.



ATTY. ANTONIO CARLOS B. BAUTISTA

Copy furnished:

ATTY. GEORGE ERWIN M. GARCIA

ATTY. JOAN M. PADILLA

G. E GARCIA LAW OFFICE

Lead Counsel for Protestant

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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. ANTONIO CARLOS B. BAUTISTA

Republic of the Philippines)
PASIG CITY)

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

I, **LAILA T. ENDIC**, hereby declare that the Urgent Ex-Parte Motion to Direct Atty. Vic Rodriguez to Disclose the Names of Persons in the Revision Area who were Aware of the Use of the Plastic Magnifying Glass submitted electronically by use of compact disc in accordance with the Efficient Use of Paper Rule are complete and are true copies of the Urgent Ex-Parte Motion to Direct Atty. Vic Rodriguez to Disclose the Names of Persons in the Revision Area who were Aware of the Use of the Plastic Magnifying Glass filed with the Presidential Electoral Tribunal.

Pasig City. 04 July 2018.

Endic
LAILA T. ENDIC
Secretary

Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for Pasig City, this 04th 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. 760;
Page No. 72;
Book No. 41e;
Series of 2018.

FERDINAND D. AYAHAO
NOTARY PUBLIC
Until December 31, 2019
Appointment No. 106(2018-2019)
For Pasig City, Pateros and San Juan City
Attorney's Roll No. 46377
IBF Lifetime Member No. 02459
MCLB No. V-0019276; 04-13-16
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