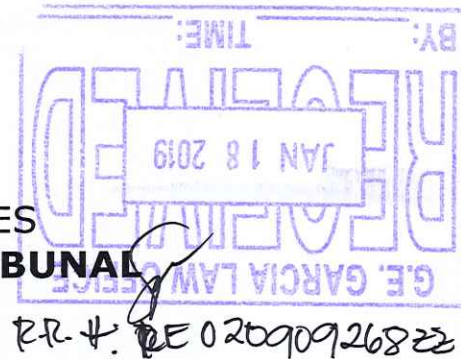


REPUBLIC OF THE PHILIPPINES
PRESIDENTIAL ELECTORAL TRIBUNAL
Manila



**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
COMMENT AND OPPOSITION
(ON THE EXTREMELY URGENT MANIFESTATION OF
GRAVE CONCERN WITH OMNIBUS MOTION DATED 10
DECEMBER 2018)**

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

PRELIMINARY STATEMENT

Once more, protestant Ferdinand R. Marcos, Jr. is before the Honorable Tribunal seeking to change the Rules in order to salvage what is left of his dying Election Protest.

Previously, protestant Marcos sought the technical examination of the signatures in the Provinces of Lanao del Sur, Basilan and Maguindanao. The Honorable Tribunal, then, in definite terms informed protestant Marcos that before any technical examination can be

conducted, it must first determine whether the Election Protest will proceed or not.

In a clever turn of events, protestant Marcos again seeks the conduct of technical examination based on the alleged findings in a case of which he and protestee Robredo are not parties of. Worse, the alleged results of the technical examination he relies on have yet to be confirmed by the Commission on Elections.

To allow protestant Marcos to prematurely conduct a technical examination is to circumvent the Rules. Not to say, cause unnecessary expense and unduly delay the disposition of the case.

1. On 04 January 2019, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) received a copy of the Extremely Urgent Manifestation of Grave Concern with Omnibus Motion dated 10 December 2018 ("Manifestation and Motion") filed by protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity).

2. In his Manifestation and Motion, protestant Marcos informed the Honorable Tribunal of the technical examination conducted by the Voters Identification Division of COMELEC-ERSD that *the 2016 National, Local and ARMM Elections has (sic) been marked with different forms of election fraud such as massive substitute voting.*¹

3. Thus, as an alleged consequence of the said findings, protestant Marcos now seeks the following remedies from the Honorable Tribunal:

"9. In view of the foregoing, it is respectfully submitted that there is an urgent and imperative need for this Honorable Tribunal to:

¹ Paragraph 6, Extremely Urgent Manifestation of Grave Concern with Omnibus Motion dated 10 December 2018.

- i. To issue a *subpoena duce tecum* to the Voters Identification Division of the COMELEC-ERSD to produce and submit the Dactyloscopic and Questioned Document Reports dated 5 June 2018 and such other relevant documents involving the technical examination conducted on the VRRs as against the EDCVLs of *Five Hundred Eight (508)* established precincts in the provinces of Lanao Del Sur, Maguindanao, and Basilan during the last 9 May 2016 National and Local Elections;
- ii. To investigate all the concerned Chairman and Members of the BEIs who served in the provinces of Lanao del Sur, Maguindanao, and Basilan during the last 9 May 2016 National and Local Elections to determine their involvement and participation concerning the incidence of substituted-voting in the said provinces; and
- iii. To immediately direct the Voters Identification Division of the COMELEC-ERSD to conduct a technical examination on the signatures and/or thumbprints appearing on the VRRs and EDCVLs of the entire *Two Thousand Seven Hundred Fifty Six (2,756)* protested clustered precincts of Lanao Del Sur, Maguindanao, and Basilan in connection with the last 9 May 2016 National and Local Elections."²

² Page 4, Extremely Urgent Manifestation of Grave Concern with Omnibus Motion dated 10 December 2018.

4. The Motion is extremely premature and a deceitful way of circumventing the **2010 Rules of the Presidential Electoral Tribunal**³, as amended ("2010 Rules").

5. More importantly, this is not the first time that protestant Marcos has attempted to circumvent the Rules.

This issue on whether a technical examination may be conducted on the voter's signatures appearing on the EDCVL vis-à-vis the Voter's Registration Record has already been passed upon by the Honorable Tribunal.

6. On 10 July 2017 or one (1) day before the scheduled Preliminary Conference, protestant Marcos filed a Motion for Technical Examination dated 10 July 2017.⁴

6.1. In his Motion for Technical Examination, protestant Marcos, even prior to the conduct of the Preliminary Conference, sought the technical examination of signatures of voters as appearing in the Election Day Computerized Voter's List (EDCVL) vis-à-vis the Voter's Registration Records (VRRs).

6.2. According to protestant Marcos, he intended to use the results of the technical examination *as part of his evidence in support of his election protest, particularly his claim that there is substantial basis for the annulment of the election results in the provinces of Lanao Del Sur, Maguindanao, and Basilan.*⁵

³ A.M. No. 10-4-29-SC.

⁴ A copy of the Motion for Technical Examination dated 10 July 2017 is hereto attached as **Annex "1"** and made an integral part hereof.

⁵ See Paragraph 3, Extremely Urgent Manifestation of Grave Concern with Omnibus Motion dated 10 December 2018.

7. During the Preliminary Conference on 11 July 2017, protestee Robredo was directed to file her Comment on the Motion for Technical Examination.

8. In compliance therewith, protestee Robredo filed her Comment and Opposition (To the Motion for Technical Examination dated 10 July 2017).⁶

8.1. Protestee Robredo hinged her Opposition to the Motion for Technical Examination on the following grounds:

8.1.1. The Provinces of Lanao del Sur, Basilan and Maguindanao are not among the designated pilot provinces of protestant Marcos.

8.1.2. There were pending incidents which must first be resolved before any collection and retrieval can be undertaken by the Honorable Tribunal.

8.1.3. There is no sufficient basis to allow the technical examination of the EDCVL.

9. Thus, in the Resolution dated 29 August 2017, the Honorable Tribunal resolved to defer action on the Motion for Technical Examination until after the initial determination of grounds for the Protest under Rule 65 of the 2010 PET Rules.⁷

10. Further, the Honorable Tribunal underscored the burden on protestant Marcos to prove the electoral frauds, irregularities and anomalies in his chosen pilot provinces:

⁶ A copy of the Comment and Opposition (To the Motion for Technical Examination dated 10 July 2017) is hereto attached as **Annex "2"** and made an integral part hereof.

⁷ A copy of the Resolution dated 29 August 2017 is hereto attached as **Annex "3"** and made an integral part hereof.

"Rule 65 of the 2010 PET Rules, as its caption states, is for the initial determination of the grounds for the protests. Following this, the revision and reception of evidence, upon designation of the provinces best exemplifying the frauds or irregularities, will begin with those provinces, thus:

INITIAL DETERMINATION OF THE GROUNDS FOR THE PROTEST

Rule 65. *Dismissal; when proper.* – The Tribunal may require the protestant or counter-protestant to indicate, within a fixed period, the province or provinces numbering not more than three, best exemplifying the frauds or irregularities alleged in his petition; and the revision of ballots and reception of evidence will begin with such provinces. If upon examination of such ballots and proof, and after making reasonable allowances, the Tribunal is convinced that, taking all circumstances into account, the protestant or counter-protestant will most probably fail to make out his case, the protest may forthwith be dismissed, without further consideration of the provinces mentioned in the protest.

The preceding paragraph shall also apply when the election protest involves correction of manifest errors."

Rule 65 provides the Tribunal with a litmus test for protestant's grounds as raised in his Protest. **These provinces constitute the "test cases" by which the Tribunal will make a determination as to whether it would proceed with the Protest – that is, retrieve and revise the ballots for all the remaining protested clustered precincts – or simply dismiss the Protest for failure of the protestant to make out his case.**" [Emphasis supplied.]

11. Since then, the circumstances have not changed.

12. The designated pilot provinces of protestant Marcos remains to be Camarines Sur, Iloilo and Negros Oriental.

The designated pilot provinces of protestant Marcos does not include the Provinces of Lanao del Sur, Maguindanao and Basilan.

The technical examination of the signatures in the Provinces of Lanao del Sur, Maguindanao and Basilan is premature.

13. As to whether the Election Protest will proceed such that the prayer for Technical Examination will be granted, rests on whether protestant Marcos will be able to prove substantial recovery in his designated pilot provinces.

14. **Rule 29 (b) (4) of the 2010 Rules** provide that the parties shall specify in their Preliminary Conference Brief

the list of not more than three provinces which the parties may designate pursuant to Rule 65.

15. Thus, Part V. of his Preliminary Conference Brief, protestant Marcos designated his Pilot Provinces:

"V. LIST OF PROVINCES FOR THE PILOT
PROTEST PURSUANT TO RULE 65 OF
THE 2010 PET RULES

Protestant Marcos is hereby designating the Provinces of **CAMARINES SUR, ILOILO** and **NEGROS ORIENTAL** as his pilot areas for the **MANUAL RECOUNT** and **JUDICIAL REVISION** of the paper ballots and/or ballot images as well as the **TECHNICAL EXAMINATION, FORENSIC INVESTIGATION, VERIFICATION** and **ANALYSIS** of the voter's receipts, election returns, audit logs, the lists of voters, particularly the Election Day Computerized Voter's List (EDCVL), and voter's registration records (VRRs), the books of voters and other pertinent election documents and/or paraphernalia used in the elections, as well as the automated election equipment and records such as the Vote Counting Machines (VCM), Consolidation and Canvass System (CCS) units, Secure Digital (SD) cards (main and back up), and the other data storage devices containing electronic data and ballot images used during the 09 May 2016 National and Local Elections.

Attached herewith as **Annexes "E" to "G"** are the listings of ALL the protested clustered precincts that functioned in the pilot provinces of **CAMARINES SUR, ILOILO** and

NEGROS ORIENTAL, respectively."
[Underscoring supplied.]⁸

16. The three (3) pilot provinces designated by protestant Marcos do not include any of the provinces in the Autonomous Region of Muslim Mindanao (ARMM).

17. As aforesated, protestant Marcos designated the Provinces of Camarines Sur, Iloilo and Negros Oriental as his pilot provinces.

18. The Provinces of Lanao del Sur, Basilan and Maguindanao, not being among the designated pilot provinces, cannot be subject of any technical examination.

19. Otherwise, protestant Marcos would be allowed to unduly expand his pilot provinces.

20. Meanwhile, in his Petition, protestant Marcos alleged that his Second Cause of Action is:

**"B.
(Second Cause of Action)**

Massive electoral fraud, anomalies and irregularities, such as, but not limited to terrorism, violence, force, threats, force, intimidation, pre-shading of ballots, vote-buying, substitution of voters, flying voters, pre-loaded SD cards, misreading of ballots, unexplained irregular and improper rejection of ballots containing votes for protestant Marcos, malfunctioning VCM, and abnormally high unaccounted votes/undervotes for the position of Vice-President compromised and corrupted the conduct of the elections and the election results

⁸ A copy of the Preliminary Conference Brief of protestant Marcos (without annexes) is hereto attached as **Annex "4"** and made an integral part hereof.

**for the position of Vice-President in
the protested precincts.**
[Underscoring supplied.]

7.1. The second ground raised by protestant Marcos in his Election Protest is the presence of massive electoral fraud, irregularities and anomalies, which pervaded the conduct of elections in **thirty-nine thousand two hundred twenty one (39,221)** clustered precincts that functioned in **Lanao del Sur, Maguindanao, Basilan**, Cebu Province, Leyte, Negros Occidental, Negros Oriental, Masbate, Zamboanga del Sur, Zamboanga del Norte, Bukidnon, Iloilo Province, Bohol, Quezon Province, Batangas, Western Samar, Misamis Oriental, Camarines Sur, 2nd District of Northern Samar, Palawan, Albay, Zamboanga Sibugay, Misamis Occidental, Pangasinan, Isabela, Iloilo City, Bacolod City, Cebu City, Lapu-Lapu City and Zamboanga City." [Emphasis supplied.]

21. During the Preliminary Conference, protestant Marcos candidly admitted that his Second Cause of Action will be limited to Thirty (30) provinces and cities including the Provinces of Maguindanao, Lanao del Sur and Basilan:

"ATTY. GARCIA:

No, Your Honor. As far as the First Cause of Action is concerned, that is limited only to proving the non-authenticity of the documents used for purposes of the canvass. **The Second Cause of Action will be limited solely, Your Honor, to the thirty (30) provinces and cities as enumerated in our Second Cause of Action.** Meaning to say, Your Honor, with all due respect, even if the

contention may be that the entire COCs used during the canvass for the Vice-President are not authentic, just the same, Your Honor, we will limit only the request for the collection, the revision and the manual recount of the ballots as far as we are concerned on the 39,221 or the 26,000 excluding the three (3) provinces of Maguindanao, Lanao del Sur and Basilan, Your Honor."⁹ [Emphasis and underscoring supplied.]

22. No less than protestant Marcos confirmed that his Second Cause of Action included the Provinces of Maguindanao, Lanao del Sur and Basilan.

23. Thus, by once more seeking the technical examination of the signatures appearing in the EDCVL in the Provinces of Maguindanao, Lanao del Sur and Basilan, protestant Marcos is seeking an exemption to the Rules.

24. In plain terms, protestant Marcos is seeking to unduly expand his pilot provinces from three (3) to six (6).

25. This must not be allowed.

26. Protestant Marcos is bound by his choice. His Election Protest will rise or fall on his designated pilot provinces of Camarines Sur, Iloilo and Negros Oriental.

27. As previously resolved by the Honorable Tribunal, before the technical examination can proceed, protestant Marcos must first establish substantial recovery in his pilot provinces.

**Protestant Marcos failed to
establish substantial
recovery in his pilot
provinces.**

⁹ Page 12, Transcript of Stenographic Notes dated 11 July 2017.

28. Protestant Marcos is desperately trying to save his dying Election Protest.

29. In the Resolution dated 18 September 2018, the Honorable Tribunal confirmed that the threshold percentage used in the 09 May 2016 National and Local Elections ranged from Twenty Percent (20%) to Twenty Five Percent (25%):

"From the foregoing, for purposes of the 2016 elections, the fifty percent (50%) shading threshold was no longer applied. It is likewise clear however that a new threshold had been applied. The submissions of COMELEC and protestee show that, during the 2016 elections, instead of a single numerical threshold, what was applied was a threshold that ranged from twenty percent (20%) to twenty five percent (25%) of the oval spaces in the ballots."¹⁰

30. The Honorable Tribunal, in the same Resolution, further confirmed the purpose of the conduct of the revision, recount and re-appreciation of ballots:

"Thus, as stated earlier, other than the registration of claims and objections of the parties, the purpose of the revision process is simply to recount the votes of the parties; and this is implemented by mimicking (or verifying/confirming) how the VCMs read and counted the votes during the elections."¹¹

31. The revisors of protestant Marcos have been present throughout the ongoing revision, recount and re-appreciation of ballots.

¹⁰ Page 11, Resolution dated September 18, 2018.

¹¹ Id.

32. Thus, protestant Marcos cannot feign ignorance on the real state of his Election Protest.

33. The numbers do not lie.

34. Prior to the Resolution dated 18 September 2018, the physical count of the ballots yielded the following results:

PROVINCE OF CAMARINES SUR						
Municipality	Election Returns		Physical Count		Loss/Difference	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
BATO	1,255	14,674	1,249	14,649	6	25
BAAO	1,296	18,555	1,280	18,438	16	117
BALATAN	717	9,470	717	9,410	0	60
SAGNAY	517	9,838	510	9,796	7	42
BULA	1,158	21,340	1,151	21,271	7	69
BUHI	1,271	24,738	1,256	24,562	15	176
OCAMPO	658	15,203	651	15,165	7	38
PILI	2,297	28,209	2,296	28,189	1	20
MAGARAO	483	12,122	483	12,108	0	14
GARCHITORENA	396	8,112	389	8,022	7	90
LAGONROY	1,066	21,800	1,045	21,567	21	233
CAMALIGAN	503	9744	503	9739	0	5
PRESENTACION	636	8,131	627	8,052	9	79
CANAMAN	313	5,568	311	5,545	2	23
SAN FERNANDO	503	14,267	502	14,159	1	108
GAINZA	258	5,418	256	5,402	2	16
MINALABAC	864	18,923	852	18,788	12	135
MILAOR	815	13,275	808	13,140	7	135
SIPOCOT	1,651	18,176	1,631	17,918	20	258
DEL GALLEG0	799	7,709	787	7,537	12	172
PASACAO	1,498	15,443	1,468	15,232	30	211
PAMPLONA	553	13,147	550	12,959	3	188
LUPI	657	9,625	651	9,518	6	107
LIBMANAN	2,619	37,536	2,584	37,089	35	447
RAGAY	2,012	16,923	1,980	16,679	32	244
GOA	1,004	19,877	986	19,520	18	357
CABUSAO	589	7,505	585	7,425	4	80
CARAMOAN	753	15,971	737	15,633	16	338
TINAMBAC	769	18,701	760	18,445	9	256
TIGAON	1,067	17,185	1,055	16,961	12	224
IRIGA CITY	2,964	36,883	2,944	36,493	20	390
NABUA	1,552	25,196	1,529	24,762	23	434
SAN JOSE	719	15,910	708	15,622	11	288

SIRUMA	430	6,702	427	6,607	3	95
NAGA	3,881	58,727	3,880	58,716	1	11
BOMBON	205	7,299	204	7,293	1	6
CALABANGA	1,109	31,897	1,108	31,896	1	1
SUBTOTAL	39,837	639,799	39,460	634,307	377	5,492

PROVINCE OF ILOILO						
Municipality	Election Return		Physical Count		Loss/Difference	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
AJUY	2,118	14,301	2,089	14,064	29	237
ALIMODIAN	1,156	10,762	1,148	10,552	8	210
ANILAO	1,066	9,607	1,052	9,417	14	190
Barotac Nuevo	2,375	17,372	2,344	16,944	31	428
BADIANGAN	771	7,922	757	7,700	14	222
BANATE	1,337	9,629	1,304	9,380	33	249
BINGAWAN	377	4,612	373	4,511	4	101
BALASAN	2,064	8,147	2,012	7,946	52	201
Barotac Viejo	2,035	11,529	1,997	11,201	38	328
BATAD	1,133	4,374	1,111	4,259	22	115
CABATUAN	2,357	16,350	2,327	15,993	30	357
CALINOG	1,978	15,999	1,947	15,567	31	432
CARLES	2,740	14,707	2,678	14,327	62	380
CONCEPCION	1,623	11,298	1,587	10,998	36	300
DINGLE	1,730	14,711	1,712	14,468	18	243
DUENAS	1,120	11,674	1,116	11,501	4	173
DUMANGAS	3,039	22,583	3,020	22,289	19	294
ESTANCIA	3,373	10,277	3,301	10,034	72	243
GUIMBAL	2,492	10,526	2,463	10,355	29	171
IGBARAS	1,582	9,849	1,571	9,671	11	178
JANIUAY	3,165	16,088	3,114	15,754	51	334
LAMBUNAO	2,373	19,983	2,348	19,617	25	366
LEMERY	1,309	9,279	1,290	9,031	19	248
LEGANES	1,510	8,631	1,500	8,483	10	148
LEON	1,548	16,440	1,524	16,100	24	340
MAASIN	1,156	11,967	1,140	11,676	16	291
MIAGAO	2,967	10,926	2,925	10,729	42	197
MINA	906	7,482	895	7,302	11	180
NEW LUCENA	1,219	7,581	1,198	7,373	21	208
OTON	4,604	22,605	4,565	22,259	39	346
PASSI	3,535	23,114	3,486	22,631	49	483
PAVIA	4,072	14,230	4,035	14,040	37	190
POTOTAN	2,937	20,323	2,896	19,895	41	428
SAN DIONISIO	1,854	10,118	1,821	9,848	33	270
SAN ENRIQUE	1,385	10,749	1,368	10,521	17	228
SAN JOAQUIN	1,780	16,001	1,764	15,741	16	260
SAN MIGUEL	1,588	9,443	1,577	9,246	11	197
SAN RAFAEL	703	4,695	690	4,601	13	94

Sta. Barbara	2,957	20,210	2,929	19,883	28	327
SARA	5,465	12,682	5,364	12,291	101	391
TIGBAUAN	2,780	20,647	2,743	20,242	37	405
TUBUNGAN	1,075	7,216	1,069	7,183	6	33
SUBTOTAL	89,047	545,380	87,843	534,364	1,204	11,016

35. Thus, prior to the issuance of the Resolution dated 18 September 2018, the result physical count during the revision, recount and re-appreciation yielded the following:

Province	Election Return		Physical Count		Gain/Loss	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
Camarines Sur	39,837	639,799	39,460	634,307	377	5,492
Iloilo	89,047	545,380	87,843	534,364	1,204	11,016
TOTAL	128,094	1,185,179	127,303	1,168,671	1,581	16,508

36. Meanwhile, after the issuance of the Resolution dated 18 September 2018, the result of the physical count during the revision, recount and re-appreciation yielded the following data:

Municipality	Election Return		Physical Count		Loss/Difference	
	Marcos	Robredo	Marcos	Robredo	Marcos	Robredo
AMLAN	936	6,496	936	6,496	0	0
AYUNGON	2,047	7,973	2,047	7,972	0	1
BACONG	1,188	7,648	1,187	7,647	1	1
BAIS	5,944	16,164	5,941	16,160	3	4
BASAY	1,261	4,533	1,260	4,533	1	0
BAYAWAN	9,092	16,281	9,089	16,279	3	2
BINDOY	1,192	6,890	1,189	6,890	3	0
CANLAON	2,415	11,666	2,411	11,666	4	0
DAUIN	1,542	6,168	1,541	6,168	1	0
DUMAGUETE	8,083	26,446	8,078	26,439	5	7
GUIHULNGAN	1,859	10,604	1,858	10,605	1	1
TOTAL	35,559	120,869	35,537	120,855	22	14

37. As the numbers do not lie, it is clear why protestant Marcos is now once more seeking the technical examination of the signatures in the Provinces of Lanao del Sur, Maguindanao and Basilan.

38. Clearly, protestant Marcos is well aware that at the termination of the revision, recount and re-appreciation

of ballots, he will miserably fail to prove any substantial recovery.

39. Now, protestant Marcos is seeking to breathe life into his dying Election Protest.

40. This simply must not be allowed.

41. For emphasis, protestant Marcos is bound by his choice. He cannot be allowed to change the rules in the middle of the game.

42. Thus, the Omnibus Motion must be denied.

PRAYER

WHEREFORE, PREMISES CONSIDERED, it is respectfully prayed to the Honorable Tribunal that the Omnibus Motion dated 10 December 2018 be DENIED for utter lack of merit.

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

Pasig City for Manila. 14 January 2019.



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Lead Counsel for Protestee

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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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By



MARIA BERNADETTE V. SARDILLO

Roll No. 45897

PTR No. 4842963/03 January 2019/Pasig City

IBP Lifetime No. 07133

MCLE Compliance No. V-0010907/30 September 2015

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Legaspi Village, 1229 Makati City

EXPLANATION

Due to unavailability of messengers and the distance of the parties, a copy of the herein "*Counter-Manifestation with Comment and Opposition*" were sent to the above-named parties by registered mail.



MARIA BERNADETTE V. SARDILLO

Republic of the Philippines)
Pasig City)
MANDALUYONG CITY

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

I, **LAILA T. ENDIC**, hereby declare that the Counter-Manifestation With Comment And Opposition (On The Extremely Urgent Manifestation Of Grave Concern With Omnibus Motion Dated 10 December 2018) 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 Comment And Opposition (On The Extremely Urgent Manifestation Of Grave Concern With Omnibus Motion Dated 10 December 2018) filed with the Presidential Electoral Tribunal.


Pasig City. 14 January 2019.


LAILA T. ENDIC
Secretary

Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for Pasig City, this 14th day of January 2019 by affiant **LAILA T. ENDIC** who is personally known to me, and appeared with her Unified Multi-Purpose ID CRN-0111-3021584-5 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. 291 ;
Page No. 59 ;
Book No. 6 ;
Series of 2019.


ATTY. JAMES K. ABUGAN
NOTARY PUBLIC
Appt. No. 0442-19
Until Dec 31, 2020
IBP No. 051567 Sept. 28, 2018
Roll No. 26890 Lifetime
MCLE No. VI-0012875 Until 4/14/2022
TIN No. 116-239-956
PTR No. 3811314/1-3-2019
Tel No. 631-40-90