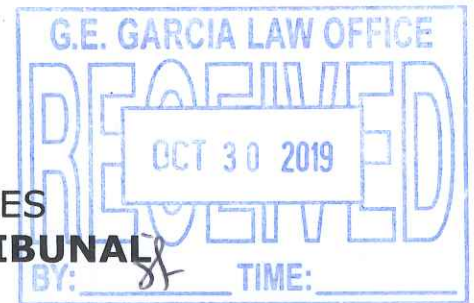


REPUBLIC OF THE PHILIPPINES  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
Manila



**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 MOTION FOR LEAVE TO BE ALLOWED TO  
SECURE THE SOFT COPIES OF THE ANNEXES IN THE  
RESOLUTION DATED 15 OCTOBER 2019**

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

1. On 21 October 2019, protestee Maria Leonor G. Robredo (hereafter "Robredo" for brevity) received copy of the Resolution dated 15 October 2019 by the Honorable Tribunal.

2. After the recount, revision and re-appreciation of the ballots from the three (3) pilot provinces, the Honorable Tribunal found that the lead of protestee Robredo increased from 263,473 to 278,566:

"The sum of TOTAL A and TOTAL B represent the votes of the parties in all the clustered precincts which functioned during the 2016 National and Local Elections, after revision and appreciation

of the ballots in the 5,415 clustered precincts in the pilot provinces, thus:

	<b>Robredo</b>	<b>Marcos</b>
<b>Total votes in the clustered precincts other than the 5,415 pilot clustered precincts</b>	12,926,159	13,953,259
Add: Total votes in the 5,415 pilot clustered precincts after revision and appreciation	1,510,178	204,512
<b>Total votes in all clustered precincts after revision and appreciation of the ballots from the pilot clustered precincts</b>	<b>14,436,337</b>	<b>14,157,771</b>

Thus, based on the final tally after revision and appreciation of the votes in the pilot provinces, protestee Robredo maintained, as in fact she increased, her lead with 14,436,337 votes over protestant Marcos who obtained 14,157,771 votes. After the revision and appreciation, the lead of protestee Robredo increased from 263,473 to 278,566."

3. In arriving at this, the Honorable Tribunal ruled on the objections and claims of the parties.

4. The rulings on the objections and claims of the parties have been attached as **Annexes "B" to "D-1"** of the

5. However, due to the volume of the documents involved, the Honorable Tribunal did not furnish the parties with copies of the said Annexes.

6. Instead, the said Annexes are made available to the parties to view.

7. Meanwhile, the parties have been directed to submit a Memorandum within twenty (20) working days *their comments on the report on the revision and appreciation of votes relating to the three pilot provinces, Camarines Sur, Iloilo and Negros Oriental as it relates to the Second Cause of Action.*

8. Hence, this Motion.

9. In order to be able to submit a comprehensive Memorandum on the report of the revision and appreciation of votes, protestee Robredo needs to examine the annexes containing the rulings of the Honorable Tribunal.

10. Thus, inasmuch as protestee Robredo appreciates that she will be able to send her representatives to view the annexes, she, nonetheless, would like to be given leave to secure the soft copy of Annexes "B" to "D-1".

11. This is the less expensive manner by which she can prepare her Memorandum.

12. Further, this will enable protestee Robredo to examine and review the rulings made on the objections and claims even beyond office hours.

13. Protestee Robredo is willing to provide the necessary compact disc, usb or external drive needed for this purpose.

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

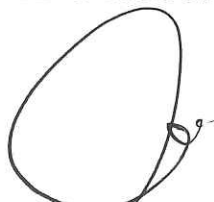


## **PRAYER**

WHEREFORE, PREMISES CONSIDERED, it is respectfully prayed of the Honorable Tribunal that protestee Robredo be given leave to secure the soft copies of rulings on the objections and claims marked as Annexes "B" to "D-1" mentioned in the Resolution dated 15 October 2019.

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

Pasig City for Manila. 21 October 2019.



**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

IBP Lifetime No. 0724

PTR No. 11660276J/07 January 2019/Las Pinas City

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

IBP Lifetime No. 07133

PTR No. 4842963/03 January 2019/Pasig City

MCLE Compliance No. VI-0018114/06 February 2019

## **REQUEST**

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

Please submit the foregoing "*Urgent Motion for Leave to be Allowed to Secure the Soft Copies of the Annexes in the Resolution dated 15 October 2019*" 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 for Leave to be Allowed to Secure the Soft Copies of the Annexes in the Resolution dated 15 October 2019*" 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. 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

### **EXPLANATION**

Due to unavailability of messengers and the distance of the parties, copies of the herein "*Urgent 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, **LAILA ENDIC-GUAN**, hereby declare that the Urgent Motion for Leave to be Allowed to Secure the Soft Copies of the Annexes in the Resolution dated 15 October 2019 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 Motion for Leave to be Allowed to Secure the Soft Copies of the Annexes in the Resolution dated 15 October 2019 filed with the Presidential Electoral Tribunal.

Pasig City. 22 October 2019.

*Leyman*  
**LAILA ENDIC-GUAN**  
Secretary  
Sardillo Sardillo Salom Law Office

**SUBSCRIBED AND SWORN TO BEFORE ME**, a notary public in and for Pasig City, this 22<sup>nd</sup> day of October 2019, by affiant LAILA ENDIC-GUAN who is personally known to me, and appeared with her UMID with no. 0111-3021584-5 issued by the 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. 437 ;  
Page No. 88 ;  
Book No. 109 ;  
Series of 2019.

**FERDINAND D. AYALAO**  
NOTARY PUBLIC  
Until December 31, 2019  
Appointment No. 106(2018-2019)  
For Pasig City, Pateros and San Juan City  
Attorney's Roll No. 46377  
JMP LRN 02439, O.R. No. 235866, 06-21-2001  
MCLE No. VI 005785, 04-02-19  
JMP No. 517-503, CI-05-19, Pasig City  
4th Floor, EDSA, Joco Ma. Escrivá Drive  
Cruzada Center, Pasig City