

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 EQUAL TIME AS PROTESTANT
MARCOS TO FILE MEMORANDUM**

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:

	Robredo	Marcos
Total votes in the clustered precincts other than the 5,415 pilot clustered precincts	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
Total votes in all clustered precincts after revision and appreciation of the ballots from the pilot clustered precincts	14,436,337	14,157,771

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"** to the Resolution.

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. Immediately thereafter or on 22 October 2019, protestee Robredo filed an Urgent Motion for Leave to Be Allowed to Secure the Soft Copies of the Annexes in the Resolution dated 15 October 2019.

9. Subsequently, on 23 October 2019, protestant Ferdinand R. Marcos, Jr. (hereafter "Marcos" for brevity) filed an Omnibus Motion [i. To Photocopy the Relevant Report/s on the Revision and Appreciation of Votes Relating to the Three (3) Pilot Protested Provinces of Camarines Sur, Iloilo and Negros Oriental and ii. To Defer the Submission of the Required Comment on the said Report.

10. In his Omnibus Motion, protestant Marcos asked for the deadline to be deferred until the requested photocopying of the reports is granted and completed:

"6. And considering that the photocopying of the reports has yet to commence, protestant Marcos is likewise constrained to move for the deferment of his deadline to submit his comments on the said report/s on the revision and the appreciation of votes until the requested photocopying of the documents reports is granted and completed."

11. Meanwhile, on even date, the representatives of both parties were present at the Honorable Tribunal for the viewing.

12. However, the representatives of the parties were informed that the Clerk of the Tribunal is still waiting for approval.

13. To date, the viewing of the Annexes by the parties has yet to commence as the Clerk of the Tribunal is still awaiting instructions and approval from the Honorable Tribunal.

14. Further, to date, the Honorable Tribunal has yet to resolve the Urgent Motion for Leave to Be Allowed to Secure the Soft Copies of the Annexes in the Resolution dated 15 October 2019.

15. Thus, inasmuch as protestee Robredo would like to comply with the Resolution dated 15 October 2019 and file her Memorandum within twenty (20) working days, she cannot do so.

16. From the time protestee Robredo received the Resolution, seven (7) out of the twenty (20) working days has already lapsed without the Annexes being viewed.

17. For this reason, protestee Robredo asks for an equal period of time to file Memorandum as prayed for by protestant Marcos in his Omnibus Motion.

18. This way, the parties will be able to file their simultaneous Memorandum as directed to by the Honorable Tribunal under its Resolution dated 15 October 2019.

19. 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 given an equal period of time as protestant Marcos to file her Memorandum.

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

Pasig City for Manila. 30 October 2019.



ATTY. ROMULO B. MACALINTAL

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REQUEST

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

Please submit the foregoing "*Motion for Equal Time as Protestant Marcos to File Memorandum*" 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
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372 Cabildo Street, Intramuros,
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OFFICE OF THE SOLICITOR GENERAL
134 Amorsolo Street
Legaspi Village, 1229 Makati City

Please take note that undersigned counsel will submit the foregoing "*Motion for Equal Time as Protestant Marcos to File Memorandum*" 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:

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ATTY. JOAN M. PADILLA

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EXPLANATION

Due to unavailability of messengers and the distance of the parties, copies of the herein "*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 Equal Time as Protestant Marcos to File Memorandum 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 Equal Time as Protestant Marcos to File Memorandum filed with the Presidential Electoral Tribunal.

Pasig City. 30 October 2019.

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LAILA ENDIC-GUAN
Secretary

Sardillo Sardillo Salom Law Office

SUBSCRIBED AND SWORN TO BEFORE ME, a notary public in and for Pasig City, this 30th 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. 450;
Page No. 91;
Book No. 109;
Series of 2019.

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