

Republic of the Philippines  
**PRESIDENTIAL ELECTORAL TRIBUNAL**  
Manila

**FERDINAND "BONGBONG" R. MARCOS, JR.,**

*Protestant,*

-versus-

**MARIA LEONOR "LENI DAANG MATUWID" G. ROBREDO,**

*Protestee.*

X- - - - - X

PRESIDENTIAL ELECTORAL TRIBUNAL  
**RECEIVED**  
FEB 07 2020  
BY: *[Signature]*  
TIME: *6:15 p.m. 01/07/20* filed

**PET Case No. 005**  
For: Election Protest  
Vice-President

**MANIFESTATION with MOTION FOR EARLY RESOLUTION OF ALL PENDING INCIDENTS**

Protestant **FERDINAND "BONGBONG" R. MARCOS, JR.** ("protestant Marcos"), through the undersigned counsels, unto this Honorable Presidential Electoral Tribunal ("PET"), most respectfully alleges the following:

1. On **21 October 2019**, protestant Marcos, through the undersigned counsels, received a copy of this Honorable Tribunal's *Resolution* dated 15 October 2019, which directed the parties to submit a **MEMORANDUM** within *twenty (20)* working days from receipt of a copy of the Resolution containing:

- I. Their comments on the report on the revision and appreciation of votes to the three (3) pilot provinces, Camarines Sur, Iloilo, and Negros Oriental as it relates to the Second Cause of Action;
- II. Their position on the following issues related to the Third Cause of Action:
  - A) Whether or not the results in the revision and appreciation of votes with respect to the Protestant's second cause of action moots or renders unnecessary the consideration of the Protestant's Third Cause of Action;

- B) Whether or not the Presidential Electoral Tribunal has the competence to resolve the Third Cause of Action;
- C) Assuming that the Presidential Electoral Tribunal has the competence to resolve the Third Cause of Action which is not mooted by the results of Tribunal's findings with respect to the second cause of action:
- 1) What are the filing rules and requirements that a party must observe if he or she seeks the relief of annulment of elections before the Presidential Electoral Tribunal?
  - 2) What is the threshold of evidence that is required to prove failure or annulment of elections?
  - 3) Will evidence other than those listed by the parties during the preliminary conference be considered?
  - 4) What percentage of votes/precincts needs to be proven as having been affected by the grounds for failure or annulment of elections?
  - 5) Will the threshold apply per province or to all three (3) provinces? Can there be failure or annulment in some but not all three (3) provinces?
  - 6) Should a similar pilot testing rule be equally applied in annulment of election cases?
- D) Assuming that the Tribunal is convinced that there is basis to find for the Protestant in the Third Cause of Action:
- 1) Will this mean that the elections for all the elective positions in the ballot be nullified with all its attendant legal consequences?
  - 2) Can our declaration as the Presidential Electoral Tribunal or the Supreme Court be a bar for any question relative to any present and future electoral protest involving the same area and for any position?
  - 3) Will it be necessary to call for special elections for the position of Vice President? If so, who has the competence to call for such elections?

- 4) Will this mean "recovery" for the Protestant under Rule 65, which will, in turn, mean revision of all his contested precincts nationwide?
- 5) What will be the effect of our ruling on Protestant's Third Cause of Action on protestee's counter protest?

The voluminous documents mentioned in this Resolution as its Annexes shall be made available to the Parties or their counsels or authorized representatives for their inspection, review, or when practicable and with prior leave, for their photocopying within reasonable business hours at the office of the Tribunal.

2. Thereafter, protestant Marcos 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] dated **22 October 2019**.

3. In a *Resolution* dated **5 November 2019**, this Honorable Tribunal resolved among others, to **GRANT** protestant's Omnibus Motion and to **DIRECT** the parties to **SUBMIT** their respective memoranda within *twenty (20)* days after completion of the requested viewing and photocopying.

4. On **18 November 2019**, this Honorable Tribunal commenced with the photocopying of the annexes to the *Resolution* dated **15 October 2019** and the same was completed on **29 November 2019**. The parties were given the hard copies of the requested annexes on even date. Hence, the parties have *twenty (20)* days from 29 November 2019 or until **19 December 2019** to file their respective memoranda.

5. In compliance with the extended deadline granted by this Honorable Tribunal, both parties filed their respective *Memoranda* on **19 December 2019**.

6. As shown above, forty-seven (**47**) days have already passed since the filing of their respective Memoranda. The pending incidents were also submitted for resolution of this Honorable

Tribunal within that same period. Nonetheless, the pending incidents remain unacted upon by this Honorable Tribunal.

7. In view of the foregoing, protestant Marcos is now constrained to respectfully move for the early resolution of the pending incidents in this case so as not to render as moot and academic the merits of this case given that the next Vice-Presidential elections is just around the corner.

### **PRAYER**

**ACCORDINGLY**, it is most respectfully prayed of this Honorable Tribunal to immediately **RESOLVE** all the pending incidents in the above-entitled case and to duly **NOTE** the foregoing Manifestation.

Other reliefs, just and equitable under the premises, are also prayed for.

City of Manila, Philippines, **4 February 2020.**

**G.E. GARCIA LAW OFFICE**  
*Lead Counsel for the Protestant*  
Ground Floor, LAIKO Building  
Cabildo St., Intramuros, Manila 1002  
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Email: geglaw.office@gmail.com

By:

A handwritten signature in black ink, appearing to be 'G.E. Garcia', is written over a series of horizontal, overlapping scribbled lines. A thin vertical line extends downwards from the signature towards the printed name below.

**GEORGE ERWIN M. GARCIA**  
Roll of Attorneys No. 44950  
PTR No. 9132121; 01-03-2020; Manila  
IBP Lifetime No.02652; Cavite Chapter  
MCLE Compliance No. VI- 0006563; 02-19-18

*Marcos v. Robredo*  
PET Case No. 005  
Manifestation with

Motion for Early Resolution of All Pending Incidents

**JOAN M. PADILLA**

Roll of Attorneys No. 54079

PTR OR No. 9269736; 01-02-2020 (Quezon City)

IBP Lifetime Membership No. 07416; Makati Chapter

MCLE Compliance No. VI-0005694; 01-10-2018

Copies furnished:

**ATTY. ROMULO B. MACALINTAL**

*Lead Counsel for Protestee Robredo*  
c/o Sardillo Sardillo Salom Law Office  
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**THE SOLICITOR GENERAL**

134 Amorsolo Street  
Legaspi Village, 1229 Makati City

**THE COMMISSION ON ELECTIONS**

Palacio Del Gobernador Building  
General Luna St., Intramuros  
Manila

RE 169 086 785 ZZ

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MANILA CENTRAL POST OFFICE

RE 169 086 794 ZZ

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Posted on: FEB 1 20

RE 144 199 755 ZZ

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1000 MANILA, PHILIPPINES  
FEB 7 20 Postmaster/Teller

**EXPLANATION**

[Pursuant to Rule 30 and 31 of the PET Rules in relation to Section 11, Rule 13 of the 1997 Rules of Civil Procedure]

Copies of the foregoing *Manifestation with Motion for Early Resolution of All Pending Incidents* were served to the above-mentioned parties by registered mail, personal service being impractical due to distance, time and manpower constraints.

**GEORGE ERWIN M. GARCIA**

**AFFIDAVIT OF SERVICE**

I, **JERRY C. GUEVARRA**, of legal age, Filipino, a clerk of **G.E. Garcia Law Office** with office address at Ground Floor, LAIKO Building, Cabildo Street, Intramuros, Manila, Philippines, after having been duly sworn to in accordance with law, hereby depose and state that:

That on **February 7, 2020**, I served a copy of **MANIFESTATION with MOTION FOR EARLY RESOLUTION OF ALL PENDING** in a case docketed as **PET Case No. 005** entitled, Ferdinand "Bongbong" R. Marcos, Jr, vs. Maria Leonor "Leni Daang Matuwid" G. Robredo" by registered mail in accordance with Section 7, in relation to Section 13, both of Rule 13 of the 1997 Rules of Civil Procedure to the ff:

<b><u>Name and Address</u></b>	<b><u>Registry Receipt No.</u></b>
<b>ATTY. ROMULO B. MACALINTAL</b> c/o Sardillo Sardillo Salom Law Office Unit 802, Taipan Place, F. Ortigas Avenue, Ortigas Center, Pasig City	RE 169 086 785 22
<b>THE SOLICITOR GENERAL</b> 134 Amorsolo Street Legaspi Village, 1229 Makati City	RE 169 086 794 22
<b>THE COMMISSION ON ELECTIONS</b> Palacio Del Gobernador Building General Luna St., Intramuros Manila	RE 144 199 755 22

by depositing a copy thereof in the post office, in sealed envelope plainly addressed to the parties at their respective office addresses indicated above, with postage fully prepaid as per registry receipt number likewise indicated above and the original registry receipt attached to the original of the pleading, 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 **February 7, 2020** at the Manila City, Philippines.

**JERRY C. GUEVARRA**  
*Affiant*

**SUBSCRIBED AND SWORN TO** before me on this 07 day of February, 2020 affiant exhibiting his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue.

Doc. No. 953  
Page No. 87  
Book No. 4  
Series of 2020.

*[Signature]*  
ATTY. ROMULO B. MACALINTAL  
February 7, 2020  
Bureau of Internal Revenue  
Manila City, Philippines  
BUREAU OF INTERNAL REVENUE  
OFFICE OF THE CLERK  
MANILA

**VERIFIED DECLARATION**


I, **JERRY C. GUEVARRA**, a clerk of the G.E. GARCIA Law Office with office address at Ground Floor, LAIKO Bldg., Cabildo St., Intramuros, City of Manila, hereby declare that the document/s (and annexes thereof) hereto submitted electronically in accordance with the Efficient use of Paper Rule is/are complete and true copy/ies of the document/s **"MANIFESTATION with MOTION FOR EARLY RESOLUTION OF ALL PENDING INCIDENTS"** in **PET Case No. 005** entitled **FERDINAND 'BONGBONG' R. MARCOS, JR., Protestant, -versus- MARIA LEONOR 'LENI DAANG MATUWID' G. ROBREDO, Protestee,** filed with the Presidential Electoral Tribunal.

Signature: \_\_\_\_\_  
Printed Name: **Jerry C. Guevarra**  
Position: Staff  
Date: February 7, 2020

**SUBSCRIBED AND SWORN** to before me this 7 FEB 2020 at Manila, Philippines, affiant exhibiting to me his Tax Identification No. 300-192-753-000. Issued by Bureau of Internal Revenue. 7 FEB 2020

\_\_\_\_\_  
Person Administering Oath

Doc. No. 254 ;  
Page No. 80 ;  
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Series on 2020.

  
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