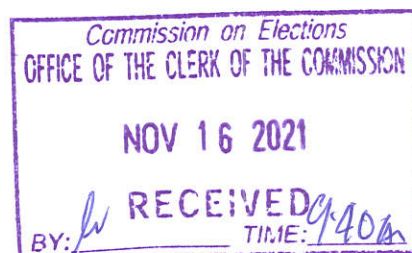


Republic of the Philippines
COMMISSION ON ELECTIONS
 Manila

SECOND DIVISION



DANILO A. LIHAYLIHAY,
Petitioner,

SPA NO. 21-003 (DC)

-versus-

FERDINAND R. MARCOS, JR.,
Respondent.

X-----X

CONSOLIDATED ANSWER

*(to the Petition dated 11 October 2021
 and the Supplemental Petition dated 9 November 2021)*

Respondent Ferdinand R. Marcos, Jr. ("BBM"), by counsel, in compliance with the Honorable Commission's *Summons with Notice of Preliminary Conference* dated 4 November 2021¹, respectfully submits this *Consolidated Answer* to the *Petition* dated 11 October 2021 ("*Petition*") and the *Supplemental Petition* dated 9 November 2021 ("*Supplemental Petition*") and states the following :

ADMISSIONS AND DENIALS

1. Paragraphs 1 to 16 of the *Petition* and paragraphs 1 to 5 of the *Supplemental Petition* are specifically denied on the ground of lack of knowledge to form a belief as to the truth thereof, for being factually and legally erroneous, baseless and false. The allegations are likewise misleading and conclusory and will be further discussed in our *Affirmative Allegations* as set forth below.

¹ In the *Summons*, the Honorable Commission gave respondent a period of five (5) days from receipt thereof within which to file an *Answer*. Respondent received the *Summons* on 11 November 2021. Thus, respondent has until 16 November 2021 to file his *Answer*.

AFFIRMATIVE ALLEGATIONS

Brief Statement of Relevant Facts

2. **BBM** has been a public servant for more than forty (40) years. It is public knowledge that he began his political career as early as 1980 after being elected as Vice Governor of *Ilocos Norte*.

3. From 1983 to 1986 and 1998 to 2007, **BBM** served as Governor of *Ilocos Norte*. From 1992 to 1995 and 2007 to 2010, he served as Representative of the Second District of *Ilocos Norte*. From 2010 to 2016, he served as a Senator of the Republic of the Philippines. And again, in 2016, he filed his candidacy and campaigned for the position of Vice-President of the Republic of the Philippines.

4. Throughout his forty (40) years of being an elected public official, **BBM** has undoubtedly exhibited leadership qualities and has continuously demonstrated his passion, vision and commitment to making our country a progressive nation.

5. During his stint as the Vice-Governor of *Ilocos Norte*, **BBM** initiated various projects for the development of his home town including, among others, the setting up of the *Ilocos Norte* Development Planning Project, the establishment of processing and storage facilities to augment agricultural produce, and the expansion of roads, bridges and other basic infrastructure. **BBM** likewise prioritized the upgrading of the basic services in the province such as water, power and province-wide transportation.

6. In 1992, while serving as the Representative of his home town, **BBM** authored several bills including the renowned *Philippine Youth Commission*.

7. Meanwhile, the province of *Ilocos Norte* has received numerous notable awards and citations in Agriculture, Education, Environment, Arts and Culture, Sports and Tourism, among others, during **BBM**'s term as the provincial Governor. In 2002, the province was awarded the Best Recommended Tourist Destination in the Philippines by the Department of Tourism.

8. As a Senator, **BBM** served as Chairman, Vice-Chairman, and member of various oversight committees.

9. In his capacity as a member of the Legislative Department, **BBM** authored, co-authored, sponsored and/or co-sponsored 372 *Bills and Resolutions* - 54 of which were passed into law.

10. Apart from his legislative achievements, **BBM** will be remembered as being one of the three (3) Senators -- together with Senator Cerefino "Joker" Arroyo and Senator Miriam Defensor Santiago -- who voted to acquit the 23rd Supreme Court Justice of the Philippines, Chief Justice Renato C. Corona. Despite all the pressures from the "powers that be" at that time, **BBM** stood his ground and based his decision on the evidence presented.

11. These are just some of **BBM's** accomplishments in his forty (40) years as a public servant.

12. On 6 October 2021, **BBM** filed his *Certificate of Candidacy for Presidency* ("**COC**") with this Honorable Commission in *Pasay City*.

13. On 11 October 2021 and 9 November 2021, Petitioner Danilo A. Lihaylihay ("**LIHAYLIHAY**") filed a *Petition* and *Supplemental Petition*, respectively, with this Honorable Commission to declare **BBM** as a nuisance candidate. **LIHAYLIHAY** would like this Honorable Commission to believe that **BBM** has no *bona fide* intention to run for the Presidency. **LIHAYLIHAY** further claims that **BBM's** **COC** should be canceled and / or denied due course because it contains false material representation .²

² Section 74, Batas Pambasa Bilang 881 or otherwise known as the "Omnibus Election Code" provides :

"The certificate of candidacy shall state that the person filing it is announcing his candidacy for the office stated therein and that he is eligible for said office; if for Member of the Batasang Pambansa, the province, including its component cities, highly urbanized city or district or sector which he seeks to represent; the political party to which he belongs; civil status; his date of birth; residence; his post office address for all election purposes; his profession or occupation; that he will support and defend the Constitution of the Philippines and will maintain true faith and allegiance thereto; that he will obey the laws, legal orders, and decrees promulgated by the duly constituted authorities; that he is not a permanent resident or immigrant to a foreign country; that the obligation imposed by his oath is assumed voluntarily, without mental reservation or purpose of evasion; and that the facts stated in the certificate of candidacy are true to the best of his knowledge. x x x" [underscoring supplied]

14. LIHAYLIHAY would want this Honorable Commission to believe that BBM's ultimate purpose for running for the Presidency is his family's political revisionism. In addition, LIHAYLIHAY claims that BBM should be perpetually disqualified from holding any public office, to vote and/or to participate in any election because [he] was convicted of plunder.³

15. By making all these baseless allegations, LIHAYLIHAY is not only wasting this Honorable Commission's time but, in effect, has also insulted the more than 14 million Filipinos who trooped to the polls during the 2016 National Elections and casted their vote in favor of BBM.

16. As shall be demonstrated below, the *Petition* and *Supplemental Petition* must be denied for being factually and legally bereft of merit.

Grounds for the Dismissal of the Petition

I

BBM is not a nuisance candidate.

II

BBM's COC does not contain false material representation. BBM is not perpetually disqualified to run for public office.

Discussion

BBM is not a nuisance candidate.

17. As stated earlier, LIHAYLIHAY is asking this Honorable Commission to declare **BBM** as a nuisance candidate.⁴

³ Page (p.) 4, Paragraph 9 of the *Petition* states :

"9. xxx Respondent should have been imprisoned already for criminal violation of Economic Plunder as finally decided by the Supreme Court En Banc in year 2003. Additionally, respondent should have been perpetually disqualified from holding any public office."

⁴ See *Petition*, pp. 7-8 and *Supplemental Petition*, p. 3.

18. According to **LIHAYLIHAY**, **BBM** has no *bona fide* intention to run for the Presidency because his main objective, apart from his family's political revisionism, is to lift the sequestration on all their alleged ill-gotten wealth.

19. **LIHAYLIHAY**'s allegations are based entirely on various documents allegedly emanating from a group called **Kilusang Bagong Liwanag**.⁵ The said documents, which were "officially received" on 25 June 2013,⁶ contain the organization's main objective to support **BBM** for President "to pursue former President Marcos' dream to make this Nation great again."⁷ **LIHAYLIHAY** has likewise made use of this document as his **sole basis** for claiming that **BBM**'s "ultimate purpose or main objective of running for the office for which the COC is filed, is his family's personal political revisionism and then to lift the sequestration of all their global ill-gotten wealth."⁸

20. For the record, **BBM** has nothing to do with the said documents. He was never a signatory thereto. He was never affiliated with **Kilusang Bagong Liwanag**. More to the point, have we ever even heard of a group called **Kilusang Bagong Liwanag**?

21. It is true that **BBM** had been affiliated with one **KBL – Kilusang Bagong Lipunan**, which was the political party founded by his father, former President Ferdinand E. Marcos. **BBM** was a member of the Kilusang Bagong Lipunan from years 1980 until 2009. To be clear, the group **BBM** was affiliated with was **Kilusang Bagong Lipunan** and not **Kilusang Bagong Liwanag**.

22. Hence, the **Kilusang Bagong Liwanag**'s objectives and aspirations, whatever they may be, cannot and should not be attributed to **BBM**. To do so is simply absurd.

23. As may be seen from **BBM**'s political experiences and achievements, not to mention his intellectual capability and foresight, it would appear that he is qualified to take on the role as our nation's next leader.

⁵ See Annex B of the Petition.

⁶ Kilusang Bagong Liwanag's Letter was "officially received" by the Office of Hon. Imelda R. Marcos, House of Representatives, on 25 July 2013.

⁷ See Petition, p. 2, Paragraph 4.1.1.

⁸ See Petition, p. 1, Paragraph 4.1.

24. On 5 October 2021, **BBM** accepted his nomination as the standard-bearer of the *Partido Federal ng Pilipinas* for the 2022 elections. *Partido Federal ng Pilipinas* is a registered political party that possesses sufficient political manpower, resources and machinery to launch a nationwide campaign.

25. That being said, there is no rhyme or reason why **BBM** will be “*a nuisance candidate who lacks bona fide intention to run for office and will put the election process in mockery or disrepute.*”⁹

26. Section 1, Rule 24 of the Commission on Elections Rules of Procedures, as amended by Resolution No. 9523 (COMELEC RULES) defines a “nuisance candidate” as one who filed his **COC** for any elective office :

- 26.1 To put the election process in mockery or disrepute;
- 26.2 To cause confusion among the voters by the similarity of the names of the registered candidates; OR
- 26.3 Who, by other acts or circumstances, is clearly demonstrated to have no *bona fide* intention to run for the office for which the **COC** has been filed, thus preventing a faithful determination of the true will of the electorate.

27. Section 69 of Batas Pambansa Blg. 881, otherwise known as the “Omnibus Election Code”, further provides for the grounds by which a candidate may be considered a nuisance candidate, to wit :

Sec. 69. Nuisance candidates. - The Commission may *motu proprio* or upon a verified petition of an interested party, refuse to give due course to or cancel a certificate of candidacy if it is shown that said certificate has been filed to **put the election process in mockery or disrepute or to cause confusion among the voters by the similarity of the names of the registered candidates or by other circumstances or acts which clearly demonstrate that the candidate has no bona fide intention to run for the office for which the certificate of candidacy has been filed and thus prevent a faithful determination of the true will of the electorate.**” [Emphasis supplied]

⁹ See *Petition*, pp. 6-7, Paragraphs 15 and 15.1.

28. In *Martinez III v. HRET*,¹⁰ the Supreme Court defined a nuisance candidate as “one who, based on attendant circumstances, has no bona fide intention to run for the office to which the Certificate of Candidacy has been filed, his sole purpose being the reduction of the votes of a strong candidate xxx”.

29. Similarly, in *Pamatong v. COMELEC*,¹¹ the High Court took pains to explain the rationale behind the prohibition against nuisance candidates and the disqualification of candidates who have not evinced a bona fide intention to run for office is easy to divine, to wit :

“The organization of an election with *bona fide* candidates standing is onerous enough. To add into the mix candidates **with no serious intentions** or capabilities to run a viable campaign would actually impair the electoral process. This is not to mention the candidacies which are **palpably ridiculous so as to constitute a one-note joke**. The poll body would be bogged by irrelevant minutiae covering every step of the electoral process, most probably posed at the instance of these nuisance candidates. It would be a senseless sacrifice on the part of the State.”
[Emphasis supplied]

30. **LIHAYLIHAY** bases his allegations on mere assumptions, conclusions and speculations as to the actual intent of **BBM** in vying for President, without providing any sufficient evidence to prove the existence of his malicious allegations.

31. Considering the foregoing, **BBM** cannot and should not be considered a nuisance candidate because his running for the highest position will neither put the election process in mockery nor prevent a faithful determination of the true will of the electorate.

32. To be sure, **BBM**’s Presidential bid for the May 2022 National Elections is for a legitimate purpose, backed with concrete plans and goals in making our country a progressive nation.

¹⁰ *Celestino Martinez v. House of Representatives Electoral Tribunal and Salimbangon*, G.R. No. 189034, 11 January 2010.

¹¹ *Elly Chavez Pamatong v. Commission on Elections*, G.R. No. 161872, 13 April 2004.

33. **BBM's** continuous ranking as the most preferred Presidential candidate in recent Presidentiable surveys would show that disqualifying or prohibiting him from joining the Presidential race would be an affront to the true will of the electorate.

34. Considering the foregoing, it is respectfully submitted that aside from possessing all the qualifications and none of the disqualifications under the Constitution and election laws, **BBM** has, beyond doubt, demonstrated his *bona fide* intention of running for the position of President.

BBM's COC does not contain false material representation. BBM is not perpetually disqualified to run for public office.

35. **LIHAYLIHAY** also asserts that **BBM's COC** should be canceled or denied due course because it contains false material representation.

36. According to **LIHAYLIHAY**, the **COC of BBM** contains false material representation because he represented himself as being eligible to run as the President of the Republic of the Philippines and that he has never been found liable for any offense which carries the accessory penalty of perpetual disqualification to hold public office, which has become final and executory.

37. To support his accusation, **LIHAYLIHAY** claims that **BBM** is disqualified to run for public office because he was allegedly convicted for **plunder**¹². This is grossly malicious and misleading.

38. First, the case¹³ that **LIHAYLIHAY** is referring to is a **civil** case and **not** a criminal case. The alleged crime of plunder was never even mentioned in the said civil case.

¹² See *Supplemental Petition*, pp. 1-2, Paragraphs 1-3.

¹³ *Republic of the Philippines v. Sandiganbayan, Ferdinand E. Marcos (Represented by his Estate/Heirs : Imelda Marcos, Maria Imelda Marcos-Manotoc, Ferdinand R. Marcos, Jr. and Irene Marcos-Araneta, G.R. No. 152154, 15 July 2003.*

39. Second, the **civil** case being referred to was against the estate of former President Ferdinand E. Marcos and **not against BBM**. **BBM** was simply an heir of the former President. Therefore, any judgment in the said case is clearly a judgment solely against the estate of the former President and **not a judgment against BBM**.

40. Finally, **LIHAYLIHAY** utterly failed to prove that the Supreme Court imposed the penalty of perpetual disqualification directly against **BBM**.

41. It is a well-settled rule in jurisprudence that a petitioner has the burden of proving his cause of action. Time and again, our Courts have stated, "*he who asserts, not he who denies, must prove*".

42. In *Spouses Boyboy v. Atty. Yabut, Jr.*,¹⁴ the Supreme Court held that sufficient evidence is necessary to support a charge, to wit :

Accusation is not synonymous to guilt. There must always be sufficient evidence to support the charge. This brings to the fore the application of the age-old but familiar rule that **he who alleges must prove his allegations**. In the case before us, **it is enough for Respondent to deny complicity** in the alleged blackmail or extortion, **without more, for he is not under obligation to prove his negative averment, much less to disprove what has not been proved by complainants**. [Emphasis supplied]

43. In *Castilex Industrial Corporation v. Vicente Vasquez, Jr.*,¹⁵ the Supreme Court made this clear :

The Court has consistently applied the ancient rule that **if the plaintiff, upon whom rests the burden of proving his cause of action, fails to show in a satisfactory manner facts which he bases his claim, the defendant is under no obligation to prove his exception or defense**. [Emphasis supplied]

¹⁴ A.C. No. 5225, 29 April 2003.

¹⁵ G.R. No. 132266, 21 December 1991.

44. Similarly, in the more recent case of *People v. Nenita B. Hu*,¹⁶ the High Court, applying the legal maxim "*El incumbit probatio qui dicit non qui negat*", held that :

In the appreciation of evidence in criminal cases, **it is a basic tenet that the prosecution has the burden of proof in establishing the guilt of the accused for the offense with which he is charged.** *El incumbit probatio qui dicit non qui negat*; i.e., "**he who asserts, not he who denies, must prove.**" The conviction of appellant must rest not on the weakness of his defense, but on the strength of the prosecution's evidence. [Emphasis supplied]

45. **BBM's COC** does not contain any false material representation. His statement that he is eligible to run for the position of President is not false as he is truthfully eligible to be a Presidential candidate.

46. Contrary to **LIHAYLIHAY's** baseless and misleading statements, the cited Supreme Court *Decision* **did not perpetually disqualify BBM** from holding any public office, to vote and to participate in any election.

47. Based on the foregoing, it is clear that **BBM** is not a nuisance candidate. If anybody should be considered a nuisance, it should be **LIHAYLIHAY** because he has wasted this Honorable Commission's time and has insulted all the Filipinos who have consistently voted for **BBM** in the forty (40) that he has been in public service.

¹⁶ G.R. No. 182232, 6 October 2008.

PRAYER

WHEREFORE, premises considered, **BBM** respectfully prays that this Honorable Commission **DISMISS** the *Petition* dated 11 October 2021 for lack of merit.

Other just and equitable reliefs are likewise prayed for.

Taguig City for Manila, 16 November 2021.

Estelito P. Mendoza

ESTELITO P. MENDOZA

Lead counsel for respondent Ferdinand R. Marcos, Jr.

Suite A, 18th Floor, Tower 6789

6789 Ayala Avenue, 1226 Makati City

Email : emram@globelines.com.ph

Roll of Attorneys No. 4441

IBP Lifetime Roll No. 01652

PTR No. 8530365/01-04-21/Makati City

MCLE Exemption No. VI-001158/11-08-18

Email : emram@globelines.cm.ph

Telephone no. +63 (02) 8817-00616; 8817-0119

Fax no : 7501-5002

In collaboration with :

M & ASSOCIATES

Collaborating Counsel for respondent Ferdinand R. Marcos, Jr.

30/F Ore Central Tower

31st Street corner 9th Avenue

Bonifacio Global City

Taguig 1634

Email : inquiry@m-associates.com

Telephone no. +63 (02) 8863 0601

By:



PAOLO S. TESTON

Roll of Attorneys No. 52114

PTR No. 6514508/ 01-06-21/Pasig City

Lifetime IBP No. 010292/RSM

MCLE Compliance No. VI- 0005372/1-12-2018



AL A. BALJON

Roll of Attorneys No. 66389

PTR No. 4596775/ 01-15-21/Mandaluyong City

Lifetime IBP No. 15065/Rizal

MCLE Compliance No. VI- 0020274/3-7-2019



DRIXEL S. DABATOS

Roll of Attorneys No. 75275

PTR No. 8536864 / 01-07-21 / Makati City

IBP Official Receipt No. 153865/01-19-21/QC

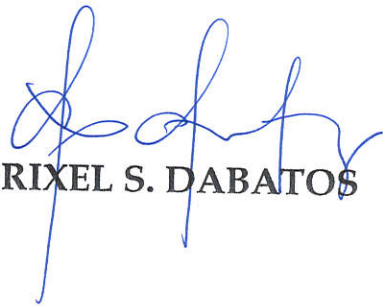
Admitted to the Bar in 2020

Copy furnished :

DANILO A. LIHAYLIHAY 94 Espejo Avenue, Don Jose Heights Commonwealth, Fairview Quezon City	Registry Receipt No. : <u>RE 552 152 521 72</u> Date : <u>11-16-21</u> Post Office: <u>Market Market</u> LBC Tracking no. _____
--	--

EXPLANATION

A copy of this *Consolidated Answer* will be served on the above addressee by **registered mail** and/or **private courier** since personal service is impracticable due to distance, time and manpower constraints.


DRIXEL S. DABATOS

VERIFICATION

I, **FERDINAND R. MARCOS, JR.**, Filipino, of legal age and with office address at G/F Sunset View Towers, 2230 Roxas Boulevard, Pasay City 1300, after having been duly sworn to in accordance with law, hereby depose and state the following :

1. I am the respondent in the case entitled "*Danilo A. Lihaylihay v. Ferdinand R. Marcos, Jr.*," filed before the Commission on Elections and docketed as SPA No. 21-003 (DC);

2. I have caused the preparation and filing of the foregoing *Consolidated Answer*; and

3. I have read and understood the contents thereof and I attest that the allegations therein are true and correct based on my personal knowledge, available records and authentic documents on hand;

4. I attest that the foregoing *Consolidated Answer* is not filed to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

5. I further attest that the factual allegations in the foregoing *Consolidated Answer* have evidentiary support or, if specifically so identified, will likewise have evidentiary support after a reasonable opportunity for discovery;

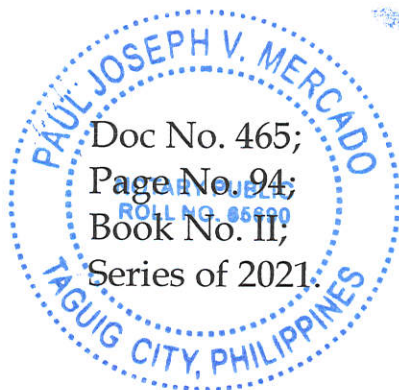
6. I attest to the truth of the foregoing statements.


IN WITNESS WHEREOF, I have hereunto affixed my signature this 16th day of November 2021 in Taguig City.


FERDINAND R. MARCOS, JR.

Affiant

SUBSCRIBED AND SWORN to before me this 16 November 2021 at Taguig City, affiant exhibiting to me his Philippine Passport No. P2450290B issued at DFA, Manila on 5 July 2019. *Affiant* is known to me to be the same person who executed the foregoing instrument and acknowledged to me that the same is his free act and deed.




PAUL JOSEPH V. MERCADO
Notary Public for and in Taguig City
30th Floor, Ore Central Tower
31st Street corner 9th Avenue
Bonifacio Global City, Taguig 1634
Application No. 25 (2021-2022)
Attorney's Roll No. 65690
PTR No. A-5075068 / 1-05-21/Taguig City
IBP No. 153861/01-19-21/QC
MCLE Compliance No. VI-0025244/4-8-19

REPUBLIC OF THE PHILIPPINES)
TAGUIG CITY) SS.
X-----X

AFFIDAVIT OF SERVICE

I, **JESSIE T. SALVADOR**, of legal age, Filipino, with office address at 30/F Ore Central Tower, 31st Street corner 9th Avenue, Bonifacio Global City, Taguig 1634, after having been sworn to in accordance with law, depose and state the following :

1. I am one of the liaison officers of **M & ASSOCIATES**, counsel for respondent *Ferdinand R. Marcos, Jr.*;

2. On 16 November 2021, I mailed one (1) copy of **Consolidated Answer** in the case entitled *Danilo A. Lihaylihay v. Ferdinand R. Marcos, Jr.* pending before the Commission on Elections, Manila by Registered Mail and Private Courier to :

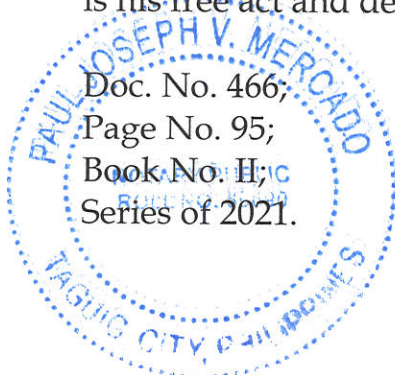
DANILO A. LIHAYLIHAY 94 Espejo Avenue, Don Jose Heights Commonwealth, Fairview Quezon City	Registry Receipt No. <u>RE 552 / 52 521 77</u> Date : 16 November 2021 Post Office : Market Market Taguig Post Office LBC Tracking No. _____
--	--


3. That the above service was done in Market-Market Taguig Post Office, as evidenced by the Registry Receipt hereto attached wherein the name of the addressee was indicated.

IN WITNESS WHEREOF, I have hereunto affixed my signature this 16th November 2021 in Taguig City.


JESSIE T. SALVADOR
Affiant

SUBSCRIBED AND SWORN to before me this 16th November 2021 at Taguig City, affiant exhibiting to me his Tax Identification No. 230-188-418-000. Affiant is known to me to be the same person who executed the foregoing instrument and acknowledged to me that the same is his free act and deed.




PAUL JOSEPH V. MERCADO
Notary Public for and in Taguig City
30th Floor, Ore Central Tower
31st Street corner 9th Avenue
Bonifacio Global City, Taguig 1634
Application No. 25 (2021-2022)
Attorney's Roll No. 85650
PTR No. A-307-096 / 1-01-21, Taguig City
JRS No. 153202/01-14-21 JRS
MCLE Compliance No. VI-0025144, 4-6-19

REPUBLIC OF THE PHILIPPINES)
TAGUIG CITY) SS.

AFFIDAVIT OF SERVICE

I, **DRIXEL S. DABATOS**, of legal age, Filipino, with office address at 30/F Ore Central Tower, 31st Street corner 9th Avenue, Bonifacio Global City, Taguig 1634, after having been sworn to in accordance with law, depose and state the following :

1. I am one of the Lawyers of **M & ASSOCIATES**, counsel for the defendant *Ferdinand R. Marcos, Jr.*;

2. On 16 November 2021 at 8:29 in the morning, I emailed to clerkofthecommission@comelec.gov.ph a copy of the *Consolidated Answer* dated 16 November 2021 in the case entitled *Danilo A. Lihaylihay v. Ferdinand R. Marcos, Jr.* with SPA No. 21-003 (DC), pending before the Commission on Elections, Manila;

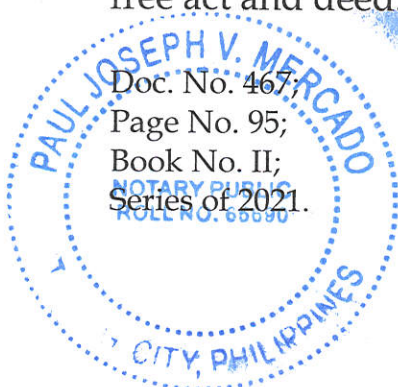
3. I took a screenshot of the email I sent to the above-mentioned party and printed the same as proof of transmittal; and


4. That I am executing this *Affidavit* to attest to the truth of the foregoing statement and for whatever legal purposes it may serve best.

IN WITNESS WHEREOF, I have hereunto affixed my signature this 16 November 2021 at Taguig City.


DRIXEL S. DABATOS
Affiant

SUBSCRIBED AND SWORN to before me this 16 November 2021 at Taguig City, affiant exhibiting to me her IBP ID No. 75275. Affiant is known to me to be the same person who executed the foregoing instrument and acknowledged to me that the same is her free act and deed.




PAUL JOSEPH V. MERCADO
Notary Public for and in Taguig City
30th Floor, Ore Central Tower
31st Street corner 9th Avenue
Bonifacio Global City, Taguig 1634
Application No. 25 (2021-2022)
Attorney's Roll No. 65690
PTR No. A-5075068 / 1-05-21/Taguig City
IBP No. 153861/01-19-21/DC
MCLE Compliance No. VI-0025244/4-8-19

From: inquiry@m-associates.com
Sent: Tuesday, November 16, 2021 8:29 AM
To: 'clerkofthecommission@comelec.gov.ph'
Cc: 'emram@globelines.com.ph'; inquiry@m-associates.com; 'vdrodriguez@bongbongmarcos.com'
Subject: CONSOLIDATED ANSWER - (Danilo A. Lihaylihay v. Ferdinand R. Marcos, Jr.) - SPA No. 21-003 (DC)
Attachments: 1.Consolidated Answer (to the Petition dated 11 October 2021 and the Supplemental Petition dated 9 November 2021) dated 16 November 2021.pdf; 2. Verification dated 16 November 2021.pdf; 3. Affidavit of Service by RM dated 16 November 2021.pdf; 4. Affidavit of Service by E- Mail dated 16 November 2021.pdf

16 November 2021

COMMISSION ON ELECTIONS

Palacio del Gobernador
General Luna Street
Intramuros, Manila 1002

Re : CONSOLIDATED ANSWER
(Danilo A. Lihaylihay v. Ferdinand R. Marcos, Jr.) - SPA No. 21-003 (DC)

Gentlemen :

For reference, attached please find the following documents in connection with the above-captioned matter :

1. *Consolidated Answer (to the Petition dated 11 October 2021 and the Supplemental Petition dated 9 November 2021) dated 16 November 2021*
2. *Verification dated 16 November 2021;*
3. *Affidavit of Service by Registered Mail dated 16 November 2021;*
4. *Affidavit of Service by Electronic Mail dated 16 November 2021.*

Other party was furnished with copies of the *Consolidated Answer* by registered mail and private courier.

Kindly acknowledge receipt of this email.

Thank you and I look forward to your usual prompt action on this matter.

Kind regards,

Drixel Jann S. Dabatos
Associate



30/F Ore Central Tower
31st Street corner 9th Avenue
Bonifacio Global City, Taguig 1634
Philippines

Telephone : +63 (02) 8863 0601

inquiry@m-associates.com

<https://m-associates.com>

IMPORTANT NOTICE:

This email and any information which it contains may be confidential, legally privileged and protected by law. It is intended for the use of the individual or entity named above and no one else. If you are not the intended recipient of this email, please notify the sender and/or **M & Associates immediately**. Do not disclose the contents of this email to any other person, use it for any purpose, and/or copy the information in any medium. Any liability arising from the unlawful disclosure of this information is hereby excluded.