

****Title:****

People of the Philippines v. Manuel Escobar (G.R. No. 214540)

****Facts:****

The case involves Manuel Escobar, accused of conspiring in the kidnapping for ransom of Mary Grace Cheng-Rosagas, daughter of Filipino-Chinese businessman Robert G. Cheng. On June 18, 2001, Mary Grace, along with her bodyguard and driver, was abducted in Quezon City. The kidnappers demanded a P15,000,000.00 ransom, which was paid for their release later that evening. The resort owned by Escobar, Club Solvento, was used to accommodate some suspects, and Escobar was implicated by state witness Cancio Cubillas.

Escobar was arrested on February 14, 2008, and charged with kidnapping for ransom. He filed a First Bail Petition, which was denied. The Court of Appeals also denied his first petition. Notably, co-accused Rolando Fajardo was subsequently granted bail, which prompted Escobar to file a Second Bail Petition on the ground of a new development. The RTC denied this petition citing *res judicata*, which was later overturned by the Court of Appeals. They ordered the RTC to set bail for Escobar, which was fixed at P300,000.00, and he ostensibly paid this amount.

The Office of the Solicitor General, representing the prosecution, filed a Petition for Review on Certiorari with the Supreme Court, asserting that the principle of *res judicata* should be respected, which was denied by Escobar on the ground that the doctrine of *res judicata* was not applicable to criminal cases. The Supreme Court ruled in favor of Escobar, recognizing that an interlocutory order concerning bail does not attain finality, and thus, is not subject to *res judicata*.

****Issues:****

1. Whether Escobar's second petition for bail was barred by *res judicata*.
2. Whether respondent Escobar should be granted bail.

****Court's Decision:****

1. *Res Judicata*: The Supreme Court held that Escobar's second petition for bail was not barred by *res judicata* because this doctrine is inapplicable in criminal proceedings. The Supreme Court emphasized that *res judicata* only applies to final judgments in civil cases, and that an order pertaining to a petition for bail is interlocutory and does not attain finality.

2. *Grant of Bail*: With the Court of Appeals having reversed the RTC and authorized bail,

Escobar's provisional liberty was to be granted upon approval of his surety bond, assuming he had already paid the P300,000.00 bail.

****Doctrine:****

- An order denying bail is interlocutory and not subject to res judicata.
- An accused may file a second petition for bail in light of new developments warranting a different view on the application for bail.

****Class Notes:****

- ***Res Judicata:***

- Civil doctrine marking a matter as judged and preventing re-litigation of the same claim.
- Requires a final judgment by a court with appropriate jurisdiction, on the merits, and identity of parties and issues between the actions.

- ***Bail:***

- Security for the release of a person in custody, presuming their innocence until proven guilty.
- In the Philippines, governed by Rule 114 of the Revised Rules on Criminal Procedure.
- Is a matter of right except for cases punishable by death, reclusion perpetua, or life imprisonment when evidence of guilt is strong.

- ***Interlocutory Order:***

- Order issued during the course of a proceeding that does not dispose of the case's merits but some incidental matter.
- Does not have the effect of res judicata, can be revised or reversed.

****Historical Background:****

- The 1987 Constitution of the Philippines, Article III, Section 13, states that all persons, except those charged with offenses punishable by reclusion perpetua when the evidence of guilt is strong, shall be bailable before conviction. The case exemplifies the practical application of this Constitutional guarantee and its interplay with judicial discretion, case law development, and procedural justice.