

### Title:

Miguel P. Paderanga vs. Court of Appeals and People of the Philippines

### Facts:

On October 6, 1986, eight accused were indicted for multiple murder in Gingoog City, Philippines. Only one was apprehended and convicted, and he later escaped. On October 6, 1988, Felizardo Roxas was implicated and charged as a co-accused, later implicating Paderanga, the former mayor, as the mastermind. Upon the City Prosecutor's inhibition, State Prosecutor Henrick F. Gingoyon was designated for the case. Paderanga was charged as a co-conspirator on October 6, 1992, and his challenge to this was rejected by the Supreme Court in G.R. No. 96080.

Before his arrest, Paderanga filed a motion for admission to bail on October 28, 1992. The motion was set for hearing on November 5, 1992. During the hearing, the public prosecutor waived further evidence opposition to the bail application, and Paderanga was admitted to bail for PHP 200,000. A motion for reconsideration by Prosecutor Gingoyon was denied on March 29, 1993. Prosecutor Gingoyon then filed a certiorari action before the Court of Appeals, which was granted on November 24, 1993, annulling the trial court's decisions due to grave abuse of discretion. The Court of Appeals noted procedural due process failures and a strong presumption of guilt based on the non-recommendation of bail by the prosecution.

### Issues:

1. Whether Paderanga was in the custody of the law, thereby allowing him to file a motion for admission to bail.
2. Whether the evidence of guilt was strong, warranting the denial of bail.
3. Whether the prosecution was afforded an opportunity to oppose the application for bail, satisfying due process requirements.
4. Whether the delay in filing the special civil action for certiorari by the prosecution was reasonable.

### Court's Decision:

The Supreme Court reversed the decision of the Court of Appeals and reinstated the resolution and omnibus order of the Regional Trial Court granting bail to Paderanga. The Court found that:

1. Paderanga was in the constructive custody of the law when he filed his application for bail.

2. The prosecution effectively waived the presentation of evidence to oppose bail, thereby making the challenge to Paderanga's provisional liberty moot.
3. The trial court adhered to procedural rules, and the prosecution was given more than a week to prepare for the bail hearing.
4. The prosecution's delay in challenging the trial court's decision on bail was unreasonable, exceeding the three-month desirable period for filing certiorari actions.

### ### Doctrine:

The doctrine in this case hinges on the right to bail, custody of the law, and procedural due process in bail proceedings. The Court upheld that a motion for admission to bail before actual arrest could be considered if the accused is constructively under the custody of the law. Also, upon the waiver of presentation of evidence by the prosecutor during a bail hearing, the court may resolve the bail application based on the evidence at hand, provided that procedural due process is satisfied.

### ### Class Notes:

- **Right to Bail**: A fundamental right given to a person in custody of the law, except in cases with strong evidence of guilt in crimes punishable by reclusion perpetua or higher.
- **Custody of the Law**: In order to file for admission to bail, the accused should be either under arrest or constructively under custody by voluntary submission to the court.
- **Procedural Due Process in Bail Proceedings**: The prosecution must be given an opportunity to present evidence if not waived, and the resolution of bail must summarize the prosecution's evidence.
- **Timeliness of Certiorari Actions**: Certiorari must be filed within a reasonable period, typically within three months from the act being questioned.

### ### Historical Background:

This case takes place in the context of the Philippine criminal justice system, emphasizing rights and procedures around bail applications and challenging the role of prosecutors in asserting opposition to bail. It speaks to the lengths that the judiciary goes to protect constitutional rights and the balance between the individual's right to liberty and the pursuit of criminal justice.