

Title:

White Light Corporation, Titanium Corporation, and Sta. Mesa Tourist & Development Corporation vs. City of Manila, Represented by Mayor Alfredo S. Lim; [G.R. No. 122846, January 20, 2009]

Facts:

On December 3, 1992, then Mayor Alfredo S. Lim of Manila signed into law City Ordinance No. 7774, which prohibited short-time admission in hotels, motels, and similar establishments in the city of Manila. The ordinance aimed to protect public morals by preventing establishments from offering short-time room rates and wash-up rates, which were believed to facilitate activities like prostitution and drug use.

Petitioners White Light Corporation (WLC), Titanium Corporation (TC), and Sta. Mesa Tourist and Development Corporation (STDC), operating drive-in-hotels and motels under the Anito Group of Companies, filed a complaint for declaratory relief with the Regional Trial Court (RTC) of Manila. They claimed their businesses were being unlawfully interfered with by the ordinance.

MTDC initially filed a separate complaint but later withdrew. The RTC issued a Temporary Restraining Order (TRO) against the enforcement of the ordinance. On January 22, 1993, the City answered, stating that the ordinance was a valid exercise of police power. The RTC later issued a writ of preliminary injunction, halting the ordinance's enforcement.

Subsequently, the RTC declared the ordinance null and void, finding it an arbitrary intrusion into the private rights of individuals and businesses, not justified by sufficient public interest. The City appealed to the Supreme Court, but the case was referred to the Court of Appeals, which reversed the RTC's decision, upholding the constitutionality of the ordinance. The petitioners then brought the case to the Supreme Court.

Issues:

1. Whether the petitioners have the legal standing to challenge the ordinance.
2. Whether the ordinance violates the right to privacy and freedom of movement.
3. Whether the ordinance is a valid exercise of police power.
4. Whether the ordinance is unconstitutional and void for being an unreasonable and oppressive interference in the business of the petitioners.

Court's Decision:

The Supreme Court granted the petition, reversed the Court of Appeals' decision, and

reinstated the RTC's decision, declaring Ordinance No. 7774 unconstitutional.

1. Legal Standing: The Court recognized the right of the petitioners to assert their business interests and also the constitutional rights of their patrons. The overbreadth doctrine was applied, allowing the petitioners to challenge the ordinance on behalf of their patrons whose personal liberties were at stake.

2. Right to Privacy and Freedom of Movement: The Court found that the ordinance did impinge upon the privacy and freedom of movement of the petitioners' clients and that legitimate sexual behavior among consenting adults would be curtailed.

3. Exercise of Police Power: The Court acknowledged that while the ordinance sought to curb vices, it was an unreasonable intrusion into personal rights. It did not prove that there was no other less intrusive means to achieve the goal and that it was necessary for public welfare.

4. Unreasonable and Oppressive Interference: The Court opined that legitimate purposes related to public morals might be achieved through less intrusive measures, thus the ordinance was an arbitrary and whimsical intrusion into private rights.

Doctrine:

The police power of the State must be exercised in consonance with the prescriptions of the Constitution and the rights it enshrines. Measures adopted under police power must have a lawful objective obtained through a lawful method, which is not unduly oppressive upon individual rights.

Class Notes:

- Legal standing: Parties need to demonstrate a sufficient interest in the outcome to support their participation, but may invoke rights of others under the overbreadth doctrine.
- Substantive and Procedural Due Process: Substantive due process inquires into the government's justification for its laws, while procedural due process concerns itself with the process the government follows.
- Police Power: It is the inherent power of the State to regulate behavior for the common welfare, but its use is restrained by the constitutional guarantee of due process.
- Overbreadth Doctrine: Allows parties to challenge statutes that infringe upon the speech or liberties of third parties, especially when those actions are widely and harmful to public attitudes about right and wrong.

Historical Background:

This case is set against the backdrop of the City of Manila's attempts to regulate morality within its jurisdiction by imposing restrictions on establishments perceived to facilitate vice. The case illustrates the ongoing tension between government's regulatory authority and individual rights in democratic societies, emphasizing the judicial function as a check against excessive government intrusion into private lives.