

Title:

George Manantan vs. The Court of Appeals, Spouses Marcelino Nicolas and Maria Nicolas
(G.R. No. 107902)

Facts:

On September 25, 1982, in Santiago, Isabela, George Manantan was involved in a car accident that resulted in the death of Ruben Nicolas, whom he had been with alongside Fiscal Wilfredo Ambrocio and another companion. The group had consumed alcohol throughout the day and continued drinking until the night of the accident, when they decided to go bowling and ended up at the LBC Night Club. Manantan, driving under the influence, collided with a passenger jeep while on their way home, which led to Nicolas' death.

The Regional Trial Court of Santiago, Isabela acquitted Manantan of homicide through reckless imprudence, refusing to rule on his civil liability. The private respondents, parents of the deceased, appealed the civil aspect of the trial court's judgment leading to a decision dated January 31, 1992, in which the Court of Appeals found Manantan civilly liable and ordered him to indemnify the respondents with a total of P174,400.00 for loss of support and damages.

Issues:

1. Whether the acquittal of Manantan foreclosed further inquiry into his negligence or reckless imprudence.
2. Whether the trial court erred in finding that Manantan's acquittal extinguished his civil liability.
3. Whether the appellate court committed a reversible error in failing to apply the Manchester doctrine to the civil aspect of the case.

Court's Decision:

1. The Supreme Court held that the Court of Appeals did not place Manantan in double jeopardy as the appeal concerned only the civil aspect of the acquittal, which does not constitute a second jeopardy for the same offense.
2. It was determined that Manantan's acquittal was based on reasonable doubt, and therefore, his civil liability was not extinguished by such acquittal. The Court of Appeals acted within its rights to review the case to determine if there was a basis for awarding indemnity and damages based on preponderance of evidence in the civil aspect.
3. Regarding the Manchester doctrine, the Supreme Court concluded that the doctrine did

not apply as the criminal action, with which the civil action was impliedly instituted, preceded the Manchester requirements. Besides, the corresponding filing fees for the civil action constitute a lien on the judgment, meaning the fees are considered paid upon the filing of the criminal complaint or information.

Doctrine:

1. The principle that an acquittal based on reasonable doubt does not extinguish the civil liability of the accused.
2. The Manchester doctrine, which requires the specification of the amount of damages sought for the basis of assessing filing fees, does not apply retroactively to the institution of criminal actions before its effectivity.

Class Notes:

- Double jeopardy is not applicable to appeals concerning only civil liability following a criminal matter.
- Civil liability is not extinguished by an acquittal based on reasonable doubt and may be sought separately through a preponderance of evidence.
- In an impliedly instituted civil action with a criminal action, actual damages claimed are not included in the computation of filing fees—these fees constitute a first lien on the judgment.

Historical Background:

The evolving jurisprudence on civil liability arising from criminal cases in the Philippines, as well as the application of procedural doctrines such as the Manchester doctrine, has shaped the legal landscape in seeking indemnification and damages post-acquittal. The Manantan case delves into these complex intersections between criminal acquittal and subsequent civil liability, influenced by the changing rules and interpretations over time within the Philippine judicial system.