

Title: Republic of the Philippines v. Estate of Ferdinand E. Marcos et al. (G.R. Nos. 149802, 150320, 150367, 153207, and 153459)

Facts:

The Republic of the Philippines, through the Presidential Commission on Good Government (PCGG), initiated Civil Case No. 0002 against former President Ferdinand E. Marcos, his wife Imelda R. Marcos, and several other individuals and entities, including the Estate of Ramon U. Cojuangco, Imelda O. Cojuangco, and Prime Holdings, Inc. (PHI), to recover alleged ill-gotten wealth. Among the assets in dispute were shares of stock in the Philippine Telecommunications Investment Corporation (PTIC), the biggest stockholder of PLDT.

Alfonso T. Yuchengco and Y Realty Corporation, petitioners in G.R. Nos. 149802 and 150320, intervened in the case, claiming ownership of a portion of PTIC shares and asserting their claim superseded that of the Republic, the Marcoses, or any other entity. Imelda R. Marcos, in her capacity, claimed that the Marcos family lawfully acquired the disputed shares. The Sandiganbayan proceeded with a separate trial specifically addressing the PLDT shares.

During the proceedings, the Sandiganbayan issued various orders and resolutions which gave rise to the filing of five consolidated petitions before the Supreme Court. The central issue was whether the Republic and petitioners Yuchengco and Y Realty Corporation were denied due process when the Sandiganbayan effectively directed them to terminate the presentation of their evidence. They also challenged the Sandiganbayan's Partial Decision on the PLDT shares rendered on May 6, 2002.

Issues:

1. Whether the Republic, Yuchengco, and Y Realty Corporation were denied due process when the Sandiganbayan effectively directed them to terminate the presentation of their evidence.
2. Whether the Sandiganbayan's Partial Decision on the PLDT shares conformed to the evidence presented, the law, and/or settled jurisprudence.

Court's Decision:

The Supreme Court granted the petition of the Republic (G.R. No. 153459) to the extent of reconveyance to the Republic of the 111,415 PTIC shares registered in the name of PHI, finding that the Sandiganbayan gravely misapprehended the weight of the evidence presented. The preponderance of evidence indicated that Ferdinand E. Marcos was the

beneficial owner of the shares in question, and PHI and its incorporators acted under the direction of Marcos, making the shares ill-gotten wealth. The petitions in G.R. Nos. 149802, 150320, 150367, and 153207 were denied for lack of merit.

Doctrine:

The Supreme Court reiterated the doctrine of preponderance of evidence in civil cases, which refers to evidence that is more convincing to the court as worthy of belief than that which is offered in opposition to it.

Class Notes:

- In civil cases involving recovery of ill-gotten wealth, the degree of proof required is preponderance of evidence.
- Judicial admissions made in the pleadings or in the course of the trial are binding upon the party who made them and may not be contradicted by him unless shown to have been made through palpable mistake.
- The right to due process is satisfied when a party is given the opportunity to be heard and to present his or her case.
- The principle of separation of powers requires that the judiciary interpret and apply the law as it is enacted by the legislature.
- Under E.O. No. 14, the PCGG has the power to recover ill-gotten wealth acquired by former President Ferdinand E. Marcos and his associates.

Historical Background:

The case is set against the historical backdrop of the Marcos regime in the Philippines, during which vast amounts of wealth were alleged to have been ill-gotten. The case represents legal efforts to recover such wealth following the ouster of the Marcos regime and the establishment of the PCGG under the Aquino administration to investigate and recover assets amassed by Marcos, his family, and his cronies during his presidency. The litigation reflects the broader political and social context of transitional justice in the Philippines post-Marcos era.