

Title: League of Cities of the Philippines v. Commission on Elections et al.

Facts: This case revolves around the conversion of 16 municipalities into cities and the constitutionality of the corresponding Cityhood Laws passed individually for each municipality. The League of Cities of the Philippines (LCP), together with the City of Calbayog and taxpayer Jerry P. Treñas, contested the constitutionality of these laws, arguing that they were in violation of the Local Government Code as modified by Republic Act No. 9009 (RA 9009). RA 9009 amended the income requirement for converting a municipality into a city, raising it to P100 million.

Initially, the Supreme Court, in its November 2008 decision, ruled these Cityhood Laws unconstitutional. However, the 16 municipalities filed a motion for reconsideration which reversed the November 2008 ruling, declaring the Cityhood Laws constitutional in December 2009. The Supreme Court again reversed this decision in August 2010, reinstating the ruling of unconstitutionality, only to swing back to upholding the constitutionality of the laws in February 2011. The petitioners filed a motion for reconsideration against the February 2011 decision but the motion was denied with finality in April 2011. Through these staggering flip-flops, the case yielded various resolutions as the parties pursued their claims and defenses up to the Supreme Court.

Issues: The principal legal issues raised in the Supreme Court's decision were:

1. Whether RA No. 9009 can be considered validly amended by the subsequent Cityhood Laws creating an exemption from its income requirements for the 16 municipalities.
2. Whether the Cityhood Laws violate the equal protection clause of the Constitution.
3. Whether the flip-flopping of the Court's decisions encounter any issues with the legal doctrines of immutability of final judgments and res judicata.

Court's Decision:

1. The Court's final ruling held that the Cityhood Laws did not violate the equal protection clause, stating that the laws complied with the criteria prior to the amendment brought by RA 9009.
2. The Court ultimately dismissed concerns over its changing decisions, concluding that the Cityhood Laws were constitutional.

Doctrine: The case touches upon the doctrine of immutability of final judgments, which postulates that a decision that has acquired finality becomes immutable and unalterable and may no longer be modified in any respect. Furthermore, it elucidates the limits of

congressional power to amend laws and the principle that laws should be free from arbitrariness to abide by the equal protection clause.

Class Notes:

- The Local Government Code prescribes qualifications for municipal conversion into cities.
- RA 9009 sets the income requirement for cityhood at P100 million based on 2000 constant prices.
- The equal protection clause in the Philippine Constitution ensures that no person or class of persons shall be deprived of the same protection of laws which is enjoyed by other persons or other classes in like circumstances.
- The doctrine of finality of judgments emphasizes that once a decision achieves finality, it should not be disturbed except for extraordinary persuasive reasons granted by the Court en banc.

Historical Background: The inconsistency of the Supreme Court in its decisions from 2008 to 2011 illustrates the complexities and dynamics of legal interpretation and the decision-making processes within the highest court of the land. Moreover, the case exemplifies the tension between legislative discretion in cityhood conversions and constitutional mandates for local government unit creation. The case is significant in Philippine jurisprudence due to its back-and-forth rulings, highlighting debates regarding adherence to the Constitution, legislative processes, and the Court's role in upholding consistent legal doctrine.