

**\*\*Title:\*\*** Islamic Da'wah Council of the Philippines, Inc. vs. MVRs Publications, Inc. et al.: A Case of Religious Defamation

**\*\*Facts:\*\***

The Islamic Da'wah Council of the Philippines, Inc., along with individual Muslims, filed a complaint for damages against MVRs Publications, Inc., and specific individuals responsible for an article in the 1 August 1992 issue of *\*Bulgar\**. The article falsely claimed that Muslims consider pigs sacred and worship them, especially during Ramadan. This accusation was seen as not only factually incorrect but deeply insulting to Muslims, attributing to them the exact opposite of their beliefs.

MVRs Publications contended that the article did not specify the complainants, thus they were not entitled to damages, positing that the piece expressed an opinion without intent to harm. The trial court initially dismissed the complaint, stating the failure to establish identifiable defamation. However, the Court of Appeals reversed this decision, acknowledging the class suit's validity and the article's clear defamatory targeting of the Islamic faith.

**\*\*Issues:\*\***

1. Does the article constitute defamation despite not naming specific individuals?
2. Can a class suit be validly instituted in this instance?
3. Are petitioners liable for damages due to the article's publication?

**\*\*Court's Decision:\*\***

The Supreme Court granted the petition, reversing the Court of Appeals' decision. It elucidated that defamation implicates the reputation of identifiable individuals, which wasn't accomplished by the article's general reference to Muslims. The principles of defamation, alongside the requirement for specificity, play against a class suit in this context, as individual reputations were not distinctly attacked.

**\*\*Doctrine:\*\***

The case reiterates that defamation claims necessitate the identification of specific individuals harmed by the defamatory statement. General references to a community or group without direct implication to identified members fall short of constituting actionable libel.

**\*\*Class Notes:\*\***

- Defamation under Philippine law requires the clear identification of the individuals

defamed.

- A class suit for defamation requires that members of the class are directly identifiable from the defamatory statement.
- Republic Act No. 10175, or the Cybercrime Prevention Act of 2012, extends defamation to electronic means while maintaining principles on identifiability and specificity.

**\*\*Historical Background:\*\***

This case emerged during a period of growing awareness and sensitivity towards religious defamation, marking the Philippines' legal stance on the balance between freedom of speech and protection of religious dignity. It underscores the essential criterion in libel or defamation cases in the country—that the offended party must be unmistakably identifiable from the statement, which was not satisfied in this instance.