

****Title:**** Estrella Taglay vs. Judge Marivic Trabajo Daray and Loverie Palacay (G.R. No. 172695)

****Facts:**** The case originates from a criminal complaint for Qualified Trespass to Dwelling lodged by Loverie Palacay against Estrella Taglay on June 19, 2001, with the 5th Municipal Circuit Trial Court (MCTC) of Sta. Maria-Malita-Don Marcelino, Davao del Sur. The MCTC, having found probable cause, had the Public Prosecutor file an Information on November 19, 2001. Taglay pleaded not guilty upon her arraignment on June 7, 2002. It emerged that Palacay was a minor at the time of the incident, prompting the MCTC, on August 15, 2002, to transfer the case to the RTC of Digos City pursuant to Republic Act No. 8369 and relevant circulars. Despite this, Taglay moved to dismiss arguing the RTC lacked jurisdiction, which was denied by the RTC. Her Motion for Reconsideration was similarly dismissed, leading to this petition for certiorari to reverse the RTC orders dated March 9, 2004, and June 7, 2004.

****Issues:****

1. Whether the RTC acquired jurisdiction over the case considering the transfer from the MCTC was premised on Circular No. 11-99, argued by the petitioner to be applicable solely to cases filed prior to its effectivity on March 1, 1999.
2. Whether the absence of a new arraignment before the RTC constituted a procedural flaw, rendering the proceedings void.

****Court's Decision:**** The Supreme Court granted the petition. It ruled that

1. The RTC indeed lacked jurisdiction over the case as Circular No. 11-99 applies only to cases filed before its effectivity date. Thus, the MCTC should have dismissed the case for lack of jurisdiction.
2. The arraignment at the MCTC, having no jurisdiction over the subject matter of the case, was null and void, necessitating a fresh arraignment before the RTC.

****Doctrine:**** The jurisdiction of a court over the subject matter of an action is determined by the statutes in force at the commencement of the action. Jurisdictional errors, particularly involving the arraignment process and the proper forum for the case, render related proceedings null and void.

****Class Notes:****

- ****Jurisdiction:**** The authority of a court to hear and decide a case; determined by law and based on the nature of the case.
- ****Arraignment:**** A procedural step where the accused is formally charged and enters a

plea; essential for due process.

- **Certiorari under Rule 65:** A remedy used to correct errors of jurisdiction, not errors of judgment.

- **Hierarchy of Courts Principle:** Direct recourse to the Supreme Court on matters that can be addressed by lower courts is generally discouraged unless compelling reasons exist.

Historical Background: The case underscores the operational challenges and jurisdictional issues faced following the institution of Family Courts in the Philippines, as embodied in R.A. No. 8369, effective November 23, 1997. It highlights procedural intricacies in the Philippine judiciary concerning the transfer of cases from first-level courts to Regional Trial Courts (RTCs) designated as Family Courts, as well as the importance of strict adherence to procedural rules to uphold due process rights.