

Title:

Jarantilla vs. Court of Appeals and Jose Kuan Sing

Facts:

1. On July 7, 1971, Jose Kuan Sing was sideswiped by a Volkswagen car driven by Edgar Jarantilla in Iloilo City, resulting in physical injuries to Sing.
2. Jarantilla was charged with serious physical injuries through reckless imprudence in Criminal Case No. 47207 at the City Court of Iloilo. Sing did not reserve his right to file a separate civil action and actively participated in the criminal case as a private prosecutor.
3. Jarantilla was acquitted based on reasonable doubt. No civil liability was awarded in the acquittal.
4. On October 30, 1974, Sing filed a separate civil case (Civil Case No. 9976) against Jarantilla for damages arising from the same incident in the Court of First Instance of Iloilo, Branch IV.
5. Jarantilla argued that Sing had no cause of action and that the civil aspect was barred by the prior criminal judgment.
6. The motion to dismiss filed by Jarantilla was denied by the trial court, which encouraged an appeal to the Supreme Court for jurisprudence enrichment.
7. Jarantilla then filed a petition for certiorari, prohibition, and mandamus with the Supreme Court (G.R. No. L-40992), which was dismissed for lack of merit.
8. After trial, the court awarded damages to Sing, which the Court of Appeals later affirmed with a reduced amount for moral damages.

Issues:

1. Whether Sing, who did not reserve his right to file a separate civil action and participated in the prosecution of the criminal case, can file a separate civil action for damages arising from the same act or omission after Jarantilla's acquittal.
2. If the Supreme Court's dismissal of Jarantilla's petition in G.R. No. L-40992 constitutes the "law of the case," thereby barring him from filing a separate civil action.

Court's Decision:

1. The Supreme Court held that a separate civil action is permissible even after an acquittal on reasonable doubt, based on Article 29 of the Civil Code. Acquittal in criminal cases does not preclude the offended party from seeking civil damages through a separate action, provided it is based on a quasi-delict.
2. The Court clarified that its previous resolutions in G.R. No. L-40992 did not constitute the "law of the case" as the issue was not fully adjudicated on its merits, thereby allowing the

consideration of Jarantilla's civil liability in a separate action.

Doctrine:

- The doctrine established in this case clarifies that a separate civil action for damages can be instituted even after the acquittal of the accused in a criminal case on the ground of reasonable doubt. This is permissible under Article 29 of the Civil Code, distinct from the civil liability *ex delicto*, and is based on the concept of quasi-delict or *culpa aquiliana*.

Class Notes:

- Key Concepts: Quasi-Delict, Civil Liability, Acquittal on Reasonable Doubt, Separate Civil Action, "Law of the Case."
- Relevant Statutes: Article 29, Civil Code of the Philippines - allows for a civil action for damages on the same act or omission even after acquittal on the ground of reasonable doubt.

Historical Background:

The Jarantilla case reflects the evolving jurisprudence on the interplay between criminal liability and civil liability in Philippine law. At the time of the incident and subsequent legal challenges, the country's legal system was grappling with the proper application and distinction between civil liability arising from a crime (*ex delicto*) and civil liability as a consequence of a quasi-delict or tort (*ex quasi delicto*). This case helped clarify that an offended party retains the right to seek civil damages even after the acquittal of the accused in a criminal case, provided the civil case is based on a quasi-delict, emphasizing the independence of civil liability from criminal liability under Philippine law.