

****Title:**** Ramon Fabie et al. vs. The City of Manila

****Facts:****

The plaintiffs, Ramon Fabie and others, owned a significant portion of land within the Hacienda de Santa Ana de Sapa, situated between Calle Herran in Paco and an estero known as Tripa de Gallina, within Manila's corporate limits. On November 26, 1909, they applied for a permit to construct a small nipa house on their property, aiming to use it as a guardhouse to prevent theft. The City of Manila denied this permit, citing non-compliance with Section 107 of the Revised Ordinances as amended by Ordinance No. 124, which required buildings to face or abut a public or officially approved private street or alley. Claiming this ordinance to be unconstitutional and an invasion of property rights without due process, the plaintiffs sought legal redress. The lower court ruled in their favor, declaring the contested provision null and void. The City of Manila appealed this decision to the Supreme Court.

****Issues:****

The sole issue presented for adjudication was the constitutionality of Ordinance No. 124, particularly whether its restrictions on building permits invaded property rights without due process, thereby infringing fundamental rights as guaranteed by the laws of the Philippine Islands and the Constitution of the United States.

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

The Supreme Court reversed the lower court's decision, upholding the validity of Ordinance No. 124. It determined that the ordinance, specifically the provision requiring buildings to abut or face upon an approved street or alley, was a reasonable exercise of the city's police power aiming to ensure public health, safety, and general welfare. The Court found these regulations neither unnecessary nor oppressively arbitrary, fitting well within the allowable limits of legislative discretion regarding public interest protections.

****Doctrine:****

The Supreme Court reiterated the doctrine that the police power of the state is a necessary function aimed at regulating and protecting public health, safety, and welfare. It emphasized that such regulations are subject to judicial review to ensure they do not arbitrarily infringe upon individual rights or impose undue restrictions.

****Class Notes:****

- ****Police Power:**** The governmental authority to enact regulations to protect the public's health, safety, and general welfare, even if this means placing certain limitations on individual rights.
- ****Due Process:**** Legal doctrine requiring laws to be fair and reasonable, ensuring that individuals are not deprived of life, liberty, or property without proper legal procedures and protections.
- ****Rights vs. Public Interest:**** The case exemplifies the balance between individual property rights and the community's interest, demonstrating that individual rights may be regulated to prevent harm to the public interest.
- ****Judicial Review:**** This case underscores the judiciary's role in reviewing the reasonableness and constitutionality of legislative actions, particularly in the context of police power exercises.

****Historical Background:****

This case, decided in the early 20th century, provides insight into the evolving understanding of municipal governance, police power, and property rights in the Philippines during American colonial rule. It reflects the judiciary's efforts to balance individual liberties with the needs of a growing urban population and the public interest in health and safety. This era saw significant legal development concerning municipal autonomy, urban planning, and public welfare, laying foundations for modern governance principles in the Philippines.