

****Title:**** Agcaoili vs. Enrile, et al., (Resolution on Habeas Corpus)

****Facts:**** Fidel V. Agcaoili, along with others, was accused of committing the crime of rebellion and was arrested on May 12, 1974, under Arrest, Search, and Seizure Order No. 3225. Following Martial Law's lift in the Philippines, a policy was implemented allowing detainees not issued with a commitment order by the President to be released on bail, leading Agcaoili to file for bail in February 1982. When his application was not acted upon, Agcaoili filed a petition for mandamus in the Supreme Court, asking to be released on bail, which was registered under G.R. No. L-60190.

Despite a recommendation for his temporary release by the Minister of National Defense in June 1984, reflecting on Agcaoili's prolonged detention versus the penalty for rebellion, no action was taken. Agcaoili's case underwent trial where he was sentenced but deemed to have already served his sentence due to prolonged detention. Despite all these, Agcaoili remained detained, prompting his family to file a petition for habeas corpus in the Supreme Court on October 22, 1984, arguing the constitutional illegitimacy of his continued detention.

****Issues:****

1. Does the extended detention of Fidel Agcaoili, after having been deemed to have served his sentence, have constitutional warrant?
2. Can the review process of the military commission and the President justify his continued detention?
3. Is the case rendered moot and academic due to Agcaoili's eventual release on October 24, 1984, as ordered by the President?

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

- ****Issue 1:**** The Court did not directly resolve this issue, as the case was deemed moot and academic upon Agcaoili's release.
- ****Issue 2:**** The Court acknowledged the review process as per existing laws but did not delve into its justifiability due to the case's mootness post-Agcaoili's release.
- ****Issue 3:**** The Supreme Court dismissed the habeas corpus petition as moot and academic, stating that Agcaoili's release rendered the petition unnecessary.

****Doctrine:**** The doctrine of mootness applies when the issues presented are no longer "live" or the parties lack a legally cognizable interest in the outcome, thereby precluding the

court from providing meaningful relief.

****Class Notes:****

1. ****Habeas Corpus:**** A writ requiring a person under arrest to be brought before a judge or into court, especially to secure the person's release unless lawful grounds are shown for their detention.
2. ****Doctrine of Mootness:**** A principle stating that courts will not decide cases in which the issue has been rendered moot or academic and thus no longer presents a justiciable controversy.
3. ****Presidential Decree No. 39 & 566:**** Regulations concerning the role of the President of the Philippines in the execution of military commission sentences; emphasizing the President's authority to approve, execute, or modify sentences.

****Historical Background:**** This case arose during a politically tumultuous period in Philippine history, under the Marcos regime, which was marked by the imposition of Martial Law (1972-1981). The backdrop of the case involves the complexities of legal procedures during and after Martial Law, touching on issues of political detainees, military commissions, and the overarching power of presidential authority. Its resolution came amidst calls for judicial and political reforms, showcasing the courts' capacity to uphold human rights and constitutional law even in politically sensitive scenarios.