

Title:

The People of the Philippines v. Eustacio de Luna et al. (102 Phil. 968)

Facts:

On December 22, 1954, in Manila, the defendants—Eustacio de Luna, Jaime P. Marco, Santos L. Pariña, Estela R. Gordo, Angelo T. Lopez, Generosa H. Hubilla, Oreste Arellano y Rodriguez, Abraham C. Calaguas, Roque J. Briones, Alawadin I. Bandon, Balbino P. Fajardo, Maria Velez y Estrellas, and Emilio P. Jardinico, Jr.—took an oath as lawyers before a notary public, despite not having passed the bar examination nor being authorized to do so. This was after they had been informed that certain portions of Republic Act No. 972, the Bar Flunkers Act of 1953, were unconstitutional and that their petitions for bar admission (for those who failed the bar examinations from 1946 to 1952) were denied by the Supreme Court in a resolution on March 18, 1954.

Upon these actions, the prosecution charged the defendants with contempt of court. The Court of First Instance of Manila initially dismissed the case citing lack of jurisdiction and that the facts did not constitute contempt of court. This led to the prosecution's appeal to the Supreme Court.

Issues:

1. Whether the Court of First Instance of Manila has jurisdiction to try and punish the defendants for contempt of court.
2. Whether the defendants' actions constituted contempt of court.

Court's Decision:

1. ****Jurisdiction****: The Supreme Court held that the Court of First Instance of Manila does have jurisdiction, overruling the initial dismissal. The jurisdiction of the court to punish for contempt is concurrent with that of the Supreme Court, thus the court of first instance is authorized to exercise such jurisdiction as provided by statute.
2. ****Contempt of Court****: The Court found the defendants guilty of contempt, determining that their actions of taking the oath as lawyers before a notary public and declaring their intention to practice law were not only an act of disobedience to the Supreme Court's resolution but also tending to degrade the administration of justice. It was tantamount to challenging the authority of the Supreme Court and manifesting disrespect.

Doctrine:

The Supreme Court reiterated the doctrine of inherent power of courts to punish for

contempt and the concurrent jurisdiction of courts in punishing acts of contempt against them. It also emphasized that assuming to be an attorney without authority and acting as such constitutes contempt of court, and such acts need not include actual practice of law to be punishable.

Class Notes:

- **Concurrent Jurisdiction**: Courts have the inherent power to punish for contempt, and such jurisdiction can be concurrent among different courts.
- **Contempt of Court**: Acts that challenge the authority, dignity, or obstruct the administration of justice of the courts, including the Supreme Court, constitute contempt of court. This includes unauthorized assumption and declaration of the role of an attorney.
- **Act No. 190, Section 236**: Defines the punishment for acts of contempt.
- **Republic Act No. 296, Section 44**: Outlines the jurisdiction over criminal cases of the Court of First Instance.

Historical Background:

The case stems from actions related to the Bar Flunkers Act of 1953 (Republic Act No. 972) and is reflective of the tension and controversy surrounding the admission to the Philippine Bar. The resolution of the Supreme Court on March 18, 1954, against the petitions of bar flunkers from the years 1946 to 1952, was a pivotal moment leading to this case, highlighting the judiciary's stance against attempts to bypass standard bar admission processes.