

### Title: **\*\*In Re Vicente Sotto for Contempt of Court\*\***

### Facts:

The case began when Atty. Vicente Sotto, a lawyer and author of the Press Freedom Law (Republic Act No. 53), publicly criticized the Supreme Court of the Philippines' decision in the matter of Angel Parazo for contempt of court. Sotto's statement, issued in various newspapers, condemned the Court's interpretation of the law, suggesting it evidenced the Court's incompetence or narrow-mindedness, and proposed a legislative reorganization of the Supreme Court.

Upon the publication of his remarks, the Supreme Court, on December 7, 1948, asked Sotto to show cause why he should not be punished for contempt for his potentially libelous statement aimed at intimidating the Court and degrading its administration of justice. Sotto was initially given five days to respond, which upon his request due to health reasons, was extended by ten more days. Despite this extension, Sotto submitted his response late, but the Court accepted it, choosing to allow for a hearing before deciding on the case. However, Sotto did not appear at the scheduled hearing on January 10, 1949, leading the Court to proceed with the decision based on the submitted documents.

In his defense, Sotto did not deny the publication but argued that the Supreme Court lacks the power to impose correctional penalties on citizens apart from fines and imprisonment as specified by law, and claimed his statement was made in the exercise of free speech and with no intention to offend the members of the Supreme Court.

### Issues:

1. Whether the Supreme Court has the authority to punish for contempt beyond the power to impose fines and imprisonment as articulated in statutes.
2. Whether Sotto's statement constitutes contempt of court.
3. The relevance and boundaries of the constitutional guarantee of freedom of speech in criticizing judicial decisions.

### Court's Decision:

The Supreme Court upheld its inherent power to punish for contempt, which is essential for maintaining its authority and ensuring the administration of justice unhampered by external pressures or prejudice. It distinguished between permissible criticism of its decisions and actions that aim to intimidate, obstruct justice, or degrade the Court's integrity. The Court found Sotto guilty of contempt for his attempts to undermine the Court's authority and

integrity with his false and inflammatory remarks and sentenced him to a fine of PHP 1,000 with subsidiary imprisonment in case of insolvency. Additionally, it summoned Sotto to show cause why he should not be disbarred.

### ### Doctrine:

The decision reiterates that the power to punish for contempt is inherent in courts of superior jurisdiction to protect their authority and ensure the administration of justice. It also highlights that while the constitutional guarantee of free speech allows criticism of judicial decisions, it does not protect actions intended to obstruct justice or maliciously attack the integrity of the judiciary.

### ### Class Notes:

- Inherent Powers of the Court: Courts of superior jurisdiction have the inherent power to punish for contempt as essential to maintaining authority and ensuring the administration of justice.
- Limitations on Freedom of Speech: The constitutional guarantee of free speech permits criticism of judicial decisions but does not extend to actions that obstruct justice or defame the judiciary with malicious intent.
- Procedural Posture: The procedural requirements for contempt proceedings include a formal show-cause order, an opportunity for the respondent to respond, and, if deemed necessary by the court, a hearing.
- Importance of Respect for Judicial Institutions: Upholding respect for courts is fundamental to the stability of legal and governmental institutions, distinguishing between constructive criticism and actions undermining the judiciary's integrity.

### ### Historical Background:

This case occurred in the post-World War II era in the Philippines, marking a period of significant legal and political transformation. It underscores the tensions between the judicial protection of institutional integrity and the exercise of free speech, reflecting on the delicate balance between individual liberties and the foundational principles of the judicial system.