

Title: In Re: The Writ of Habeas Corpus for Reynaldo de Villa (Reynaldo de Villa vs. Director, New Bilibid Prisons)

Facts:

Reynaldo de Villa, together with his son June de Villa, filed a petition for the issuance of a writ of habeas corpus under Rule 102 of the Rules of Court, contesting Reynaldo's imprisonment and seeking a new trial based on purported exculpatory DNA evidence. This follows a final judgment on February 1, 2001, where Reynaldo was found guilty of raping Aileen Mendoza, resulting in his reclusion perpetua and the birth of Leahlyn Mendoza.

The conviction was based on the victim's testimony and medical evidence. Reynaldo's defense was alibi and incapacity due to old age. The appeal led to the affirmation of the conviction but modified the penalty to reclusion perpetua and obligated support for Leahlyn Mendoza.

Years after the conviction, the Free Legal Assistance Group informed Reynaldo de Villa's family about DNA testing, resulting in an unsuccessful motion for reconsideration for a DNA test. Subsequently, petitioner-relator June de Villa acquired saliva samples from Leahlyn and other relatives for DNA testing, which purportedly showed Reynaldo could not be the father of Leahlyn.

Issues:

1. Does the application of a writ of habeas corpus and a motion for a new trial stand valid to overturn a final and executory judgment based on post-conviction DNA evidence?
2. Is the DNA evidence presented after conviction admissible as "newly discovered evidence" to justify granting a new trial?

Court's Decision:

The Supreme Court dismissed the petition for habeas corpus and a new trial for lack of merit.

1. **Habeas Corpus:** The Court ruled that the writ of habeas corpus does not serve as a tool to directly attack a judgment rendered by a competent court. It is applicable only in instances where an individual's liberty is unlawfully restrained. The petition did not establish a legal ground for habeas corpus, such as deprivation of a constitutional right, absence of court jurisdiction, or excessive penalty imposition.
2. **New Trial:** The Court stated that the request for a new trial based on newly

discovered evidence (DNA testing), claimed to exonerate Reynaldo de Villa, did not meet the requisites for such a motion. Specifically, the evidence could have been discovered and produced during the trial with reasonable diligence, and the judgment had already become final and executory.

Doctrine:

- The writ of habeas corpus cannot be employed to challenge a final judgment by a competent court, except in cases of legal irregularities that cast doubt on jurisdiction or constitutional rights.
- DNA evidence obtained post-conviction does not qualify for a new trial under the grounds of “newly discovered evidence” if it could have been procured at the time of trial with reasonable diligence.

Class Notes:

- **Habeas Corpus:** A remedy to demand release from unlawful detention. The petition must relate to issues of legality around the detention, not to revisit the merits of the case.
- **Newly Discovered Evidence:** For evidence to be considered newly discovered for the purpose of a new trial, it must have been unobtainable at trial despite diligent effort, be material to the case, and likely change the verdict if presented.

Historical Background:

This case is indicative of the evolving understanding and application of DNA evidence in the Philippine legal system, especially concerning convictions based on testimonial and circumstantial evidence prior to the widespread availability and acceptance of DNA testing in judicial proceedings.