

Title: Philippine Savings Bank (PSBank) and Pascual M. Garcia III v. Senate Impeachment Court

Facts:

The case initiated when PSBank and its President Mr. Pascual M. Garcia III filed a Petition for Certiorari and Prohibition against the Senate of the Republic of the Philippines, serving as the Impeachment Court during the trial of then Supreme Court Chief Justice Renato C. Corona. The crux of the petition sought to nullify the resolution of the Impeachment Court that granted the prosecution's request for subpoena duces tecum ad testificandum. This subpoena compelled PSBank and/or its representatives to testify and furnish documents related to the foreign currency accounts supposedly owned by Chief Justice Corona. However, on November 5, 2012, amid the petition's pendency, the petitioners moved to withdraw their petition, citing the mootness of their dilemma caused by the completion of the impeachment proceedings against Chief Justice Corona. They argued that with the conclusion of the impeachment trial and Corona's subsequent conviction, along with his execution of a waiver against the confidentiality of his bank accounts, the petitioners were no longer in a position where they needed to choose between violating Republic Act No. 6426 (RA 6426) and being held in contempt of court for non-disclosure of the foreign currency deposit details.

Issues:

The principal legal issue discussed by the Supreme Court was whether to determine the Impeachment Court's alleged arbitrary action in issuing the subpoena for the foreign currency deposit details, notwithstanding the deposit's confidentiality under RA 6426. However, this issue became moot and academic following the conviction of Chief Justice Corona and his waiver of confidentiality.

Court's Decision:

The Supreme Court resolved to dismiss the petition for being moot and academic as the main legal issue had been rendered irrelevant by the supervening events. It emphasized the principle that courts do not decide questions that no longer present an actual, substantial controversy. Accordingly, since there was no practical legal relief or remedy that the Court could provide, it abstained from passing judgment on the merits of the case. The Court also lifted the temporary restraining order issued on February 9, 2012.

Doctrine:

The case reaffirmed the doctrine that courts will not entertain questions that have become moot and academic, thereby lacking a justiciable controversy. This principle ensures that

judicial resources are solely dedicated to disputes where courts can provide actual, substantive relief to the parties involved.

Class Notes:

1. Moot and Academic Principle: Courts decline jurisdiction in cases where no actual interests are at stake or the issue has become moot, meaning there is no longer a live controversy requiring resolution.
2. Mootness due to Supervening Events: A case becomes moot if subsequent events occur that make it impossible for the court to grant any effective relief.
3. Temporary Restraining Order (TRO): A court order temporarily prohibiting certain actions until a full hearing can be conducted. The lifting of a TRO occurs when its basis is no longer relevant.

Historical Background:

The PSBank v. Senate Impeachment Court case is situated within the historical context of the impeachment trial of Chief Justice Renato C. Corona, a landmark legal proceeding that captured the nation's attention. It highlights the legal controversies surrounding bank confidentiality laws and the challenges faced by financial institutions caught between their statutory obligations and compliance with judicial or quasi-judicial bodies' orders. Additionally, this case underscores the impact of supervening events, such as a respondent's conviction and the waiver of confidentiality rights, on the mootness of legal disputes before the courts.