

### Title: Manly Sportswear Manufacturing, Inc. vs. Dadodette Enterprises and/or Hermes Sports Center

### Facts:

The case began when Special Investigator Eliezer P. Salcedo, on behalf of Manly Sportswear Mfg., Inc. (MANLY), applied for a search warrant with the Quezon City Regional Trial Court (RTC) on March 14, 2003. The application was premised on allegations that Dadodette Enterprises and Hermes Sports Center possessed goods infringing on MANLY's copyright under Sections 172 and 217 of Republic Act (RA) No. 8293 (Intellectual Property Code of the Philippines). The RTC, under Judge Estrella T. Estrada, issued Search Warrant No. 4044(03) on March 17, 2003.

Respondents contested the search warrant's validity, arguing the goods were not original and, hence, not copyrightable under RA 8293. The RTC eventually quashed the warrant on June 10, 2003, reasoning that MANLY's products were not original creations and that similar products by different brands predated MANLY's registrations. MANLY's subsequent motion for reconsideration was denied on August 11, 2003.

MANLY escalated the issue to the Court of Appeals, which upheld the trial court's decision. Following a rejected motion for reconsideration on September 15, 2004, MANLY filed a petition for review on certiorari with the Supreme Court, raising questions about the trial court's discretion in assessing the originality of its copyrighted products.

### Issues:

The sole legal issue for the Supreme Court's determination was whether the Court of Appeals erred in finding that the RTC did not commit grave abuse of discretion by declaring, in a quashal hearing, that MANLY's products were not original creations protected under RA 8293.

### Court's Decision:

The Supreme Court denied MANLY's petition, affirming the decisions of both the lower court and the Court of Appeals. It highlighted the trial judges' exclusive power to issue and quash search warrants and found no abuse of discretion in the RTC's reevaluation of the evidence or its decision to quash the search warrant. The Court underscored that a judicial finding during probable cause assessment for search warrant issuance or quashal does not constitute a final determination of copyrightability or ownership, which can instead be addressed in a separate copyright infringement suit.

### Doctrine:

The decision established or reiterated several important legal principles, including:

1. The inherent power of courts to issue and quash search warrants, which includes the capacity to reevaluate probable cause for their issuance.
2. The principle that a court's determination regarding the existence of probable cause, especially in questions of copyright originality and validity, is provisional and does not preclude further judicial examination in subsequent proceedings.
3. Certificates of copyright registration serve merely as prima facie evidence of copyright; they do not conclusively establish copyright validity or ownership, especially when challenged by credible evidence to the contrary.

### ### Class Notes:

- **Inherent Powers of Courts:** Courts have the inherent authority to issue search warrants and subsequently quash them upon reevaluation of the evidence.
- **Copyright Originality:** For a work to be copyrightable under RA 8293, it must be an original creation. This determination is critical during the issuance or quashal of search warrants involving copyrighted goods.
- **Certification and Registration:** Copyright certificates issued by the National Library and the Supreme Court Library are prima facie evidence of copyright but are not conclusive proof of ownership or copyright validity.

### ### Historical Background:

This case underscores the complexities of copyright law in the digital age, particularly the challenges in protecting intellectual property rights amidst evolving markets and technologies. It highlights the judiciary's role in balancing copyright protection against the risk of stifling competition and innovation, reflecting ongoing global debates around copyright law and enforcement.