

Title: Padilla et al. vs. Congress of the Philippines

Facts:

On May 23, 2017, President Rodrigo Duterte issued Proclamation No. 216, declaring martial law and suspending the privilege of the writ of habeas corpus in Mindanao, citing armed attacks by terrorist groups as the basis. Consequently, he submitted a report to both the Senate and the House of Representatives within 48 hours, as required by the Constitution. Following this, separate briefings were held for the members of the Senate on May 29, 2017, and for the House of Representatives on May 31, 2017, detailing the situation in Mindanao.

After the briefings, the Senate, through Senate Resolution No. 49, expressed support for the proclamation but did not call for a joint session to deliberate on the matter, with a vote tally of 17-5. Similarly, the House of Representatives, through House Resolution No. 1050, expressed full support for Proclamation No. 216 and found no reason to revoke it, deciding against a proposal for a joint session after internal debates. Consequently, two petitions were filed before the Supreme Court challenging the Congress's refusal or failure to convene in joint session to deliberate on Proclamation No. 216.

Issues:

1. Whether the failure of the Congress to convene in joint session to review the martial law proclamation constitutes an abdication of its mandated duties under the Constitution.
2. Whether the Supreme Court has jurisdiction over the case and if the petitions fulfill the requirements for judicial review.

Court's Decision:

The Supreme Court dismissed the petitions. It ruled that the Constitution does not mandate the Congress to automatically convene in joint session to review a martial law proclamation unless it seeks to revoke such proclamation. The Constitution only requires Congress to vote jointly in cases of revocation. The Court also held that it has jurisdiction over the case, but the actions taken separately by both chambers of Congress were within their respective rules of procedure, which do not violate the Constitution.

Doctrine:

The case reiterates the doctrine of separation of powers, emphasizing that each branch of the government has exclusive cognizance of matters within its jurisdiction, subject only to the checks and balances provided in the Constitution. It also clarified the interpretation of

Article VII, Section 18 of the 1987 Constitution concerning the Congress's role in reviewing a declaration of martial law or the suspension of the privilege of the writ of habeas corpus, stating that it is not mandatory for Congress to convene in joint session unless it intends to revoke the declaration.

Class Notes:

- The principle of separation of powers delineates the exclusive domains of the Legislative, Executive, and Judicial branches, ensuring a system of checks and balances.
- Article VII, Section 18 of the 1987 Philippine Constitution explicitly outlines the powers and limitations of the President regarding the declaration of martial law and the suspension of the privilege of the writ of habeas corpus, including the role of Congress in reviewing such declaration.
- A petition for mandamus requires: (1) a clear legal right to the act demanded; (2) a duty on the part of the respondent to perform the act, which is mandatory, not discretionary; and (3) no other plain, speedy, and adequate remedy in the ordinary course of law.
- Principles of judicial review allow the Supreme Court to assess if there has been a grave abuse of discretion amounting to lack or excess of jurisdiction by any branch or instrumentality of the Government.

Historical Background:

The deliberations and decisions surrounding Proclamation No. 216 took place within a constitutional framework that was thoroughly revised post-EDSA Revolution (1986) to prevent the misuse of martial law powers. The 1987 Philippine Constitution introduced strict guidelines and checks concerning martial law declarations, fundamentally shaped by experiences under the Marcos dictatorship. This case tests these constitutional safeguards and interprets the legislative branch's exact responsibilities vis-à-vis a President's declaration of martial law, inherently reflecting the democratic principles and protective measures installed by the 1987 Constitution.