Title:
Carmelo C. Bernardo vs. People of the Philippines and F.T. Ylang-Ylang Marketing Corporation

Facts:
Carmelo C. Bernardo was charged before the Metropolitan Trial Court (MeTC) of Manila with six counts of violation of Batas Pambansa Blg. 22 (B.P. 22), known as the Bouncing Checks Law, on December 3, 1997, for issuing six postdated checks in the amount of P22,500 each. The checks were dishonored due to the account being closed. Bernardo pleaded "not guilty" and, after missing a pre-trial conference, was tried in absentia following the issuance of a warrant of arrest. Bernardo attempted to quash the charges for two of the checks, arguing that the facts did not constitute an offense, but this was denied by the MeTC.

Despite the issuance of another warrant of arrest for failing to appear at a trial date, the trial court found Bernardo guilty of all charges in October 2001 and imposed a sentence. Bernardo's motion for a new trial was denied due to procedural failures, and subsequent appeals to the RTC and CA were either denied or dismissed for failing to meet procedural requirements, such as timely filing and proper documentation. The CA dismissed Bernardo's petition due to late filing and for not including key documents, and denied his motion for reconsideration.

Issues:
1. Whether the Court of Appeals erred in computing the 15-day extension period for filing the petition for review.
2. Whether the application of procedural rules by the Court of Appeals was overly strict.
3. Whether the appellate court failed to consider the merits of Bernardo's petition for review.

Court's Decision:
The Philippine Supreme Court denied Bernardo's petition. It upheld the Court of Appeals' computation of the 15-day extension for filing the petition for review, affirming the principle that such extension commences immediately after the expiration of the original period. The Court also agreed with the strict application of procedural rules by the Court of Appeals, emphasizing the importance of submitting required documents in the proper form as stipulated by the rules. It was highlighted that procedural lapses led to the rightful dismissal of Bernardo's appeals, rendering the RTC's judgment final and executory. Moreover, the

Court clarified that the trial in absentia and the proceedings therein were valid, as Bernardo waived his right to be present by failing to appear unjustifiably.

Doctrine:
– Extensions for filing petitions are to be counted from the expiration of the original period, with no discretion to reckon the commencement from a later date.
– Procedural requirements, such as the submission of essential documents in appeals, are strictly enforced, underscoring the importance of adherence to prescribed procedural rules.
– A trial in absentia is valid provided that the accused has been arraigned, duly notified of the trial, and their failure to appear is unjustifiable.

Class Notes:
– In criminal cases, especially those involving B.P. 22, the issuance of bouncing checks, the procedural sequence, and adherence to rules are fundamental for the appeal processes.
– Key procedural missteps can result in the dismissal of appeals, emphasizing the critical role of timely and proper filing of motions and petitions, including adherence to documentary requirements.
– The principles governing extensions of time, trials in absentia, and the promulgation of judgments form the core of the case, illustrating the balancing act between procedural rigour and substantive justice.

Historical Background:
This case reflects the Philippine legal system's stringent approach towards procedural compliance in criminal appeals, demonstrating the judiciary's emphasis on the procedural integrity of legal proceedings as a vital component of the justice delivery mechanism. It highlights the nuanced interpretation of rules related to filing deadlines, documentation, and representation in court, underpinning the legal principle that procedural lapses can significantly impact the outcome of appeals, thereby reinforcing the sanctity of procedural law in the adjudication process.