

Title:

****Chavez v. Presidential Commission on Good Government (PCGG) and Gunigundo****

Facts:

The case arose from a petition filed by Francisco I. Chavez seeking to nullify the General and Supplemental Agreements dated December 28, 1993, entered into by the PCGG and the heirs of former President Ferdinand Marcos, on the ground that they were contrary to law and the Constitution. The Supreme Court, in its decision promulgated on December 9, 1998, declared the agreements null and void. Subsequently, the Marcos heirs filed a “Motion for Leave to Intervene with Motion for Leave to File the Attached Partial Motion for Reconsideration” on January 22, 1999, and a Memorandum of Authorities on March 16, 1999, claiming they were parties and signatories to the said agreements and that their exclusion from the case denied them constitutional rights to due process and equal protection.

Issues:

1. Is intervention allowed after the final judgment has been rendered?
2. Were the Marcos heirs deprived of due process and equal protection of the laws?
3. Does the principle of the hierarchical administration of justice prohibit the Supreme Court from taking cognizance of direct actions before it?
4. Can a petition filed in the Supreme Court to enforce constitutional rights preempt proceedings in the Sandiganbayan?
5. Does partial implementation of the null and void agreements through PCGG’s actions ratify them?

Court’s Decision:

1. ****Intervention After Final Judgment****: The Court held that the motion for intervention could not be allowed since it was filed after the final judgment had been promulgated, and no plausible excuse was presented for the delay.
2. ****Due Process and Equal Protection****: The Court found that the Marcos heirs were not indispensable parties to the case because the agreements in question were invalid for being contrary to the Constitution and the laws. Their rights were not infringed as the agreements were null and void ab initio.
3. ****Hierarchical Administration of Justice****: The Court dismissed the claim that it violated the principle by taking direct action, noting the case involved constitutional and legal questions of public interest.
4. ****Preemption of Sandiganbayan Proceedings****: The Court clarified it did not preempt

Sandiganbayan's jurisdiction but resolved constitutional issues that would help in the expeditious resolution of the ill-gotten wealth cases.

5. **Ratification of Agreements**: The Court reiterated that the null and void agreements could not be ratified, nor could they acquire validity over time.

Doctrine:

The doctrine established in this case underscored the non-ratifiability of agreements that are null and void ab initio due to contravention of the Constitution and laws. It also highlighted that the intervention could not be permitted post the issuance of the final decision by the court.

Class Notes:

1. **Null and Void Ab Initio Contracts**: Contracts that violate the Constitution or laws are null and void from the outset and create no legal rights or obligations.
2. **Indispensable Parties**: Those parties without whom no final determination can be had of an action, differing from incidental parties whose interests are not directly affected by the outcome.
3. **Principle of Hierarchical Administration of Justice**: Generally pertains to cases involving factual questions, not directly applicable when the Supreme Court exercises primary jurisdiction over constitutional and legal questions of public interest.
4. **Ratification**: An invalid agreement cannot be made valid by ratification or the passage of time if it is against the Constitution and laws.
5. **Intervention**: Must be timely filed before the final judgment, with strict adherence to procedural rules, unless in the interest of substantial justice, the Court deems otherwise.

Historical Context:

This case reflects the ongoing legal challenges and complexities in recovering ill-gotten wealth accrued during the Marcos regime in the Philippines. It underscores the Supreme Court's role in adjudicating cases that have significant implications on public interest and governance, particularly in cases involving accusations of corruption and abuse of power. The decision also highlights the procedural and substantive limitations to post-judgment interventions in the Philippine legal system.