

Title: *Datukan Malang Salibo vs. Warden, Quezon City Jail Annex*

Facts:

Datukan Malang Salibo (*Salibo*) was mistakenly identified as *Butukan S. Malang*, an accused in the 2009 Maguindanao Massacre involving 57 murder charges. From November 7 to December 19, 2009, *Salibo* was in Saudi Arabia for the Hajj pilgrimage, thus proving his absence at the time of the massacre. Despite presenting evidence of his overseas trip, on August 20, 2010, *Salibo* was detained in Quezon City Jail Annex.

On September 17, 2010, *Salibo* filed a petition for habeas corpus in the Court of Appeals, which was granted, but the warden failed to comply with the directive to present *Salibo* in court initially. The Regional Trial Court eventually ruled in favor of *Salibo's* immediate release. However, the Court of Appeals overturned this decision, leading to *Salibo's* appeal to the Supreme Court on the grounds of improper detention due to mistaken identity.

Issues:

1. Whether the decision of the Regional Trial Court, Branch 153, Pasig City on petitioner *Salibo's* Petition for Habeas Corpus was appealable to the Court of Appeals.
2. Whether *Salibo's* proper remedy to contest his detention was a Petition for Habeas Corpus.

Court's Decision:

The Supreme Court granted *Salibo's* petition, ruling that:

1. The respondent warden correctly appealed the habeas corpus decision to the Court of Appeals.
2. *Salibo* was improperly detained and that a petition for habeas corpus was indeed the proper remedy due to the illegality of his detention from mistaken identity.

Doctrine:

The Supreme Court reiterates the doctrine that habeas corpus is the appropriate remedy for cases of detention due to mistaken identity, as the person detained is not restrained by lawful court orders or under any legal charges.

Class Notes:

- **Habeas Corpus**: A legal action or writ through which detainees can seek relief from unlawful imprisonment. This case illustrates its use in addressing wrongful detention due to mistaken identity.
- **Mistaken Identity**: A defense in criminal law where a person claims not to be the

individual charged with an alleged offense, shown through evidence proving the person was elsewhere during the crime.

- ****Appeal Process in Habeas Corpus Cases****: Determines the correct appellate procedure for habeas corpus rulings, clarifying that decisions by lower courts designated by higher courts are appealable to the court with jurisdiction over the appellant court.

- ****Legal Remedies for Wrongful Arrest****: Distinction between habeas corpus petitions versus motions to quash in instances of wrongful arrest due to mistaken identity.

Historical Background:

This case unfolds within the broader context of the Maguindanao Massacre, a significant and highly publicized criminal case in the Philippines. It underscores the challenges in the legal system, particularly regarding wrongful identification and incarceration, emphasizing the importance of procedural and substantive safeguards to protect individuals' rights to liberty and due process.