

**\*\*Title:\*\*** Alejandro C. Almendras, Jr. vs. Alexis C. Almendras: A Case of Alleged Libel and Defamation

**\*\*Facts:\*\*** Alejandro C. Almendras, Jr. sent letters to House Speaker Jose de Venecia, Jr. and Dr. Nemesio Prudente in February 1996, discrediting his brother, Alexis C. Almendras, by calling him a “reknown blackmailer” and accusing him of harassing the family through legal actions. These letters were circulated in Digos, Davao del Sur, and Quezon City. In response, Alexis filed a damages lawsuit for libel and defamation against Alejandro in the RTC of Digos City. During the trial, Alejandro failed to present evidence, leading to a decision against him. He sought reconsideration and a new trial, which were denied. On appeal, the CA affirmed the RTC’s decision, leading Alejandro to file a Petition for Review with the Supreme Court.

**\*\*Issues:\*\***

1. Whether Alejandro was deprived of due process.
2. Whether the letters constituted libel.
3. Whether the letters qualified as privileged communication.
4. Whether Alexis was entitled to damages.

**\*\*Court’s Decision:\*\***

1. **\*\*Due Process:\*\*** The Court found Alejandro was not deprived of due process. His failure to present evidence or clarify his medical conditions, despite ample opportunity, bound him to his lawyer’s actions.
2. **\*\*Nature of the Letters:\*\*** The Court deemed the letters libelous, violating the requisites set by Article 353 of the Revised Penal Code, as they were defamatory, malicious, publicized, and Alexis was identifiable.
3. **\*\*Privileged Communication:\*\*** The letters did not qualify as privileged communications because they were circulated beyond parties with a direct interest, demonstrating malice.
4. **\*\*Damages:\*\*** While the Court confirmed entitlement to damages for Alexis, it reduced the moral and exemplary damages awarded by the lower courts and removed the awards for attorney’s fees and litigation expenses, citing a lack of justification.

**\*\*Doctrine:\*\*** The decision reiterates the criteria for defamation under the Revised Penal Code and specifies the requirements for an imputation to be considered privileged communication. It underscores that every defamatory imputation is presumed malicious unless proven otherwise and that damages in libel cases must be justifiably related to the harm caused.

**\*\*Class Notes:\*\***

- Elements of libel under Philippine law: Defamatory statement, Malicious intent, Publicity, Identifiable victim.
- Privileged communication requires a legal, moral, or social duty; Addressed to someone interested or with duty in the matter; Made in good faith without malice.
- Malice is presumed in cases of defamation, making the defense of privileged communication crucial.
- Proof of pecuniary loss is not necessary for moral damages; however, factual basis and causal connection must be established.
- Attorney's fees and litigation expenses require explicit justification for awards in court decisions.

**\*\*Historical Background:\*\*** The case provides insight into the legal process surrounding defamation in the Philippines and adopts the standards set by the Revised Penal Code regarding libel. It exemplifies the challenges of distinguishing between personal vendettas and protected communications, especially within politically influential families, and highlights the judiciary's role in balancing free expression and protection against defamation.