

****Title:**** Corazon Macapagal v. People of the Philippines (G.R. No. 728 Phil. 182)

****Facts:****

1. Corazon Macapagal was charged with Estafa for allegedly misappropriating jewelry worth PHP 800,000.
2. On November 25, 2008, the RTC rendered a decision convicting Macapagal for Estafa.
3. Macapagal received the RTC decision on January 13, 2009. She filed a motion for reconsideration which was denied on May 20, 2009, and she received the denial on July 31, 2009.
4. Macapagal filed a Notice of Appeal on August 3, 2009, but this was deemed late and denied on June 29, 2010.
5. Petitioner brought her case directly to the Supreme Court through a petition for review on certiorari under Rule 45 of the Rules of Court.

****Issues:****

1. Whether the RTC erred in denying the Notice of Appeal filed by Macapagal.
2. Whether the RTC committed a grievous error by convicting Macapagal of the crime of Estafa.
3. Whether the RTC erred in denying Macapagal's Motion for Reconsideration and/or New Trial.

****Court's Decision:****

1. ****Wrong Mode of Appeal****: The Supreme Court determined that Macapagal availed of the wrong mode of appeal. The proper method to challenge the RTC's denial of her Notice of Appeal would have been through a special civil action under Rule 65, not a petition for review under Rule 45.
2. ****Violation of the Hierarchy of Courts****: Even if the petition was considered under Rule 65, it was dismissible for violating the hierarchy of courts. The Supreme Court noted that lower courts handle such reviews unless special and compelling reasons justify a direct approach, none of which were present.
3. ****Procedural Non-Compliance****: The inclusion of only the Order denying her Notice of Appeal without attaching the assailed decisions regarding her conviction and denial of the motion for reconsideration was a fatal procedural shortcoming, as the Rules require these critical documents for reviewing the petition.
4. ****Repeated Non-Compliance****: The Court also addressed repeated failures to comply

with procedural orders and requirements despite notices and extensions granted by the Court. These included the lack of proper verification, certification of non-forum shopping, and failure to file necessary responses to other directives.

Given that multiple procedural errors and omissions hindered the appropriate consideration of the merits, the Supreme Court denied the petition.

****Doctrine:****

1. ****Correct Mode of Appeal****: Appeals must be made through the correct legal remedies provided by procedural rules, such as Rule 65 for special civil actions when challenging orders denying Notices of Appeal.
2. ****Hierarchy of Courts****: Observing the hierarchy of courts is essential, and direct appeals to the Supreme Court are reserved for special and compelling reasons.
3. ****Procedural Compliance****: Adherence to procedural norms, like timely filing of appeals and proper documentation, is critical. Non-compliance can lead to outright dismissal and failure of the case.

****Class Notes:****

- ****Elements of Estafa (Article 315, No. 1(b) of the Revised Penal Code)****:

1. Accused received money, goods, or other personal property by transaction specified in law.
2. Misappropriation or conversion of such for personal benefit.
3. Denial of such receipt despite demand.

- ****Appeal under Philippine Laws****: Section 2 & 3, Rule 122, Revised Rules of Criminal Procedure; Rule 45 and Rule 65, Rules of Court.

- ****Procedural Requirements for Review****: Proper verification, certification of non-forum shopping (Sec. 1, Rule 45; Sec. 4, Rule 7; Sec. 5, Rule 7, Rules of Court).

****Historical Background:****

This case illuminates the strict procedural norms within the Philippine judicial system, adhering to an accumulated tradition emphasizing orderly legal processes. Procedural adherence ensures the efficient management of courts with high caseloads and maintains judicial orderliness, demonstrating contemporary applications of these enduring principles.