

****Title:****

Zenaida Reyes v. Court of Appeals and the People of the Philippines

****Facts:****

On April 7, 1986, an information for falsification of public document was filed against Zenaida Reyes before the Regional Trial Court (RTC) of Bulacan (Branch 22, Criminal Case No. 9252-M). The allegation was that Reyes falsified a deed of sale involving four parcels of land by forging the signature of Pablo Floro, who was incapable of signing due to age and infirmity. Reyes was arraigned and pleaded not guilty.

The trial ensued, and on February 6, 1989, the defense was scheduled to present its evidence. The hearing was rescheduled to March 10, 1989, due to Reyes' illness. The March 10 hearing was postponed to April 12, 1989, because of the absence of both the private prosecutor and defense counsel Atty. Analuz Cristal-Tenorio. On April 12, 1989, Atty. Tenorio was again absent, along with Reyes, who submitted a medical certificate. The hearing was deferred to May 17, 1989.

A motion by Atty. Tenorio postponed the May 17 hearing to June 5, 1989. However, Atty. Tenorio was absent again on June 5, resulting in another rescheduling to July 10, 1989. On July 10, 1989, both Reyes and Atty. Tenorio were absent, prompting the trial court to declare a waiver on the part of Reyes to present her evidence, despite a subsequent medical certificate submitted by Reyes on July 14, 1989.

Reyes sought reconsideration, which the court denied, scheduling the promulgation of judgment on September 29, 1989. On this date, Reyes was convicted and sentenced to 4 months of *arresto mayor* as minimum and 4 years and 2 months of *prision correccional* as maximum, along with a fine of P5,000.00.

Through Atty. Ronolfo S. Pasamba, Reyes filed a notice of appeal to the Court of Appeals (CA-G.R. CR. No. 08410). Reyes later moved for new trial, alleging negligence by her counsel, but the Court of Appeals denied her motion and affirmed the conviction on May 28, 1993, subsequently denying her motion for reconsideration on August 30, 1993.

Reyes escalated the case to the Supreme Court, arguing that her conviction was void due to the denial of her right to present evidence. The Supreme Court initially denied the petition but later granted a motion for reconsideration and remanded the case for a new trial.

****Issues:****

1. ****Whether Reyes' right to due process was violated due to her counsel's negligence.****
2. ****Whether the trial court properly held Reyes to have waived her right to present evidence.****

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

1. ****Due Process and Counsel's Negligence:****

The Court found that the repeated absence of defense counsel, Atty. Tenorio, was the critical factor that led to the waiver of the defense's right to present evidence. The Supreme Court emphasized that the negligence displayed by Atty. Tenorio was so gross that it impacted Reyes' constitutional right to be heard. The Court held that Reyes, under the oversight of her absentee counsel, could not be deemed to have intentionally attempted to delay proceedings.

2. ****Waiver of the Right to Present Evidence:****

The trial court had discretion in managing postponements but was found to have exercised this discretion harshly in this case. The Supreme Court concluded that the trial court's denial of further postponements and declaration of a waiver by Reyes was not justified given the circumstances. Reyes' illnesses and her lawyer's absences indicated that the denial to present evidence was more a failure of her counsel rather than any capricious or deliberate stalling by Reyes.

Considering the significant stakes involving personal liberty and the need for due process, the Supreme Court concluded that a new trial was warranted. The decision of the Court of Appeals and the RTC was set aside, and the case was remanded for a proper presentation of defense evidence.

****Doctrine:****

The Court reiterated the principle that the discretion of trial courts in granting postponements should be exercised judiciously, especially in criminal cases involving personal liberty. Gross negligence by counsel, such as failing to attend scheduled hearings, can deprive an accused of a fair trial, mandating corrective measures to ensure the right to due process is upheld.

****Class Notes:****

- **Key Concepts:**

- Due Process: The constitutional guarantee to fair legal proceedings.
- Negligence: Gross failure of a legal duty by an attorney impacting a client's rights.
- Waiver: Knowing relinquishment of a known right.
- Postponements: Court's discretion and the reasonable limits to postponing hearings.

- **Rules and Statutes:**

- **Rule 121, Section 2:** Grounds for new trial include errors of law or irregularities prejudicial to the accused's rights and discovery of new, material evidence.
- **Rule 121, Section 6:** Effects of granting a new trial, including setting aside the original judgment and allowing presentation of additional evidence.

- **Applications:**

- Courts must balance procedural rules with substantial justice.
- Postponements must consider illness and legitimate reasons.
- Counsel's gross negligence that impacts fundamental rights warrants remedial action.

Historical Background:

This case underscores the judiciary's commitment to upholding fundamental rights amid procedural technicalities. It reflects a period where Filipino jurisprudence increasingly recognized the detrimental impact of gross legal negligence on the accused's right to a fair trial, even as it navigated complex procedural rules balancing expedience and justice.