

Title: Maguddatu v. Court of Appeals and People of the Philippines

—

Facts:

1. **Initial Charges and Arrest**:

- Aniceto Sabbun Maguddatu and Laureana Sabbun Maguddatu, along with others, were charged with murder for killing Jose S. Pascual. The case was lodged at the Regional Trial Court (RTC) of Makati, Branch 64.

2. **Motion for Bail**:

- On October 23, 1985, petitioners filed a motion to be admitted to bail, citing weak evidence from the prosecution.

3. **Granting of Bail**:

- After a partial trial on the merits, the RTC issued an order on December 20, 1985, granting bail at P30,000 each. Petitioners posted bail through AFISCO Insurance Corporation.

4. **Expiration of Bail Bond**:

- On January 6, 1987, AFISCO Insurance Corporation sought to cancel the bail bond because the petitioners failed to renew it upon its expiration on December 20, 1986. The court's action on this motion was not documented.

5. **Conviction**:

- On January 2, 1998, the trial court convicted petitioners and others for homicide, sentencing them to an indeterminate prison term of 8 to 14 years. The conviction was promulgated in absentia, leading to an order for the immediate arrest of petitioners on February 19, 1998.

6. **Notice of Appeal and Motion for Bail Pending Appeal**:

- While at large, petitioners filed a Notice of Appeal on February 27, 1998, along with a motion to be granted provisional liberty under the same bail bond pending appeal. The trial court did not resolve this and forwarded the case to the Court of Appeals.

7. **Court of Appeals' Resolution**:

- On January 8, 1999, the Court of Appeals required the petitioners to show cause why their appeal should not be dismissed for their failure to submit to authorities while noting that

approval for bail is discretionary.

8. **Petitioners' Compliance and Continued Absence**:

- On February 8, 1999, petitioners expressed willingness to submit to authorities but remained at large. On June 23, 1999, the Court of Appeals denied their application for bail and ordered their arrest.

9. **Dismissal of Appeal**:

- On September 8, 1999, the Court of Appeals dismissed the appeal for failure to submit to its jurisdiction, ordering the RTC to issue arrest warrants for the petitioners.

10. **Petition for Certiorari**:

- Petitioners contested the Court of Appeals' resolution by filing a petition for certiorari with the Supreme Court on August 30, 1999.

—

Issues:

1. **Entitlement to Bail as a Matter of Right or Discretion**:

- Whether petitioners were entitled to bail as a matter of right or if it was discretionary for the court after their conviction.

2. **Grave Abuse of Discretion**:

- Whether the Court of Appeals committed grave abuse of discretion in denying petitioners' application for bail and refusing to recall the order of arrest.

—

Court's Decision:

1. **Bail as a Matter of Right or Discretion**:

- The Supreme Court affirmed that the entitlement to bail after conviction is discretionary, particularly given the offense was not punishable by death, reclusion perpetua, or life imprisonment. The court confirmed the applicability of Sections 4, 5, and 7 of Rule 114 of the Rules of Court. Petitioners' bail was correctly deemed a matter of discretion post-conviction.

2. **Grave Abuse of Discretion**:

- The Supreme Court found no grave abuse of discretion by the Court of Appeals. The petitioners had violated their bail conditions by not surrendering and staying at large, which justified the denial of their application for bail pending appeal. Furthermore, failure to renew the bail bond precluded the use of the original bond per SC Administrative Circular 12-94 requirements. Their subsequent actions strongly indicated a probability of flight and non-compliance with the court's orders.

—

Doctrine:

1. **Discretionary Bail Post-Conviction**:

- Bail after conviction by the RTC is at the court's discretion, especially when the imposed penalty exceeds six years but not more than twenty years (Rule 114, Section 5).

2. **Conditions for Maintaining Bail Post-Conviction**:

- Bail can be maintained post-conviction if certain conditions are met, including the bondsman's consent and lack of violations of bail conditions. Failure to meet these can result in bail being denied or revoked.

—

Class Notes:

- **Section References**:

- Rule 114, Sections 4, 5, and 7: Principles guiding bail as a matter of right and discretion.

- **Bail Conditions**:

- Effective upon approval and remains in force until RTC judgment promulgation (Sec 2(a), Rule 114).

- Violations of bail conditions, non-submission to authorities, or failure to renew bail bonds can forfeit bail rights.

- **Supreme Court Administrative Circular 12-94**:

- Bail bond validity and necessity for bondsman's consent for continuation post-conviction.

- **Case Law**:

- People v. Patajo, Feliciano v. Pasicolan: Discretion in bail post-conviction.

—

Historical Background:

The case arises from the procedural complexities around rights to bail in the context of Philippine criminal justice. It exemplifies the balance between the right to liberty and the demands of justice administration, underlining statutory and judicial controls on the right to bail, especially after a conviction. The decision reinforces judicial discretion and procedural compliance for maintaining provisional liberty during appeals, reflecting evolving procedural norms under the new rules of criminal procedure.