

Title: Mijares, Rosales, et al. vs. Ranada, and the Estate of Ferdinand E. Marcos, G.R. No. 139325

Facts:

On May 9, 1991, ten Filipino citizens, who had suffered human rights abuses under the Marcos regime, filed a complaint with the United States District Court in Hawaii against the Estate of Ferdinand E. Marcos. Invoking the Alien Tort Act, the plaintiffs alleged instances of torture, arbitrary detention, and execution. The U.S. District Court certified the case as a class action and, following a jury verdict, awarded the plaintiffs a total judgment of \$1,964,005,859.90. On December 17, 1996, the U.S. Court of Appeals for the Ninth Circuit affirmed this judgment.

On May 20, 1997, the petitioners sought to enforce this judgment by filing a complaint with the Regional Trial Court (RTC) of Makati City (Civil Case No. 97-1052). The petitioners paid a filing fee of PHP 410. On February 5, 1998, the Marcos Estate filed a motion to dismiss, claiming incorrect filing fee payment. Judge Santiago Javier Ranada of the Makati RTC dismissed the complaint on September 9, 1998, stating the matter was capable of pecuniary estimation and thus needed a computed filing fee of PHP 472,000,000. The petitioners sought reconsideration, which was denied on July 28, 1999. Following that, they filed a Petition for Certiorari under Rule 65.

Issues:

1. Whether an action to enforce a foreign judgment is capable of pecuniary estimation.
2. The applicable rule for computing the filing fees for such an action.
3. If the imposition of high filing fees violated the petitioners' constitutional right to free access to courts.

Court's Decision:

1. **Enforcement of Foreign Judgment Capable of Pecuniary Estimation:**
 - The Supreme Court held that the subject matter of the complaint (enforcement of a foreign judgment) is capable of pecuniary estimation. The enforcement sought a definite monetary award, making it subject to pecuniary evaluation.
2. **Applicable Rule for Filing Fees:**
 - The Court found that while Section 7(a) (pertaining to money claims against an estate not based on a judgment) was applied by the respondent judge, the correct provision was Section 7(b)(3) (actions not involving property). This meant a uniform minimal filing fee

should apply, and not the exorbitant amount computed by the RTC.

3. **Constitutional Right to Free Access to Courts:**

- While the petitioners invoked the constitutional right to free access, the Supreme Court did not base its decision on this premise. Instead, it focused on correcting procedural misapplications by the lower court and ensuring reasonable filing fees under existing rules.

Doctrine:

- **Enforcement of Foreign Judgments:** The Court emphasized that actions for enforcing foreign judgments are capable of pecuniary estimation but are covered by the uniform filing fee for actions not involving property per Section 7(b)(3) of Rule 141.

- **General Principles of Comity and Recognizing Foreign Judgments:** The ruling reaffirmed the importance of comity, which respects final judgments of competent foreign courts under stipulated conditions unless challenged on specific grounds (want of jurisdiction, notice, collusion, fraud, or mistake of law or fact).

Class Notes:

- **Recognition and Enforcement of Foreign Judgments:** Emphasizes comity and specific procedural rules (Rule 39, Section 48).

- **Jurisdictional Guidelines:** Differentiated between monetary claims against estates based on non-judgment (Section 7(a)) and actions generally not involving property (Section 7(b)(3)).

- **Filing Fees:** Proper computation and distinctions between various types of civil actions concerning filing fees, especially relevant in cases with foreign elements.

Historical Background:

- The case reflects the continuing struggle for justice by human rights victims of the Marcos regime, highlighting ongoing efforts to enforce accountability and recover damages awarded by foreign courts for abuses during the martial law period (1972-1987). This period in Philippine history was marked by significant human rights violations under the dictatorship of Ferdinand E. Marcos.