

### Title:

**Heirs of Teofilo Gaudiano vs. Constancio Benemerito et al., G.R. No. 171020**

### Facts:

1. **Initial Case**:

- Respondents filed an action for redemption against petitioners before the Regional Trial Court (RTC) of Cebu City, Branch 21.

2. **RTC Decision**:

- On October 7, 2005, the RTC rendered a decision allowing the respondents to redeem their respective areas of cultivation from the petitioners and directed petitioners to execute the documents necessary for the redemption.

- Petitioners received a copy of the decision on December 21, 2005.

3. **Motion for Extension**:

- Instead of filing a notice of appeal, petitioners filed a **Motion for Extension of Time to File a Notice of Appeal** on January 4, 2006, claiming their counsel, Atty. Antonio Villaflor, suffered a stroke in mid-2005, necessitating the engagement of new counsel.

4. **Notice of Appeal**:

- On January 13, 2006, petitioners filed a notice of appeal through their new counsel, Atty. Virgilius Santiago.

5. **RTC Order**:

- On April 17, 2006, the RTC issued an order denying the petitioners' motion for extension, declaring the October 7, 2005 decision final and executory, citing Section 3, Rule 41 of the Rules of Civil Procedure which does not allow such a motion.

6. **Petition for Review on Certiorari**:

- Aggrieved, petitioners filed a Petition for Review on Certiorari, arguing the justification for their late appeal due to their counsel's incapacitation.

### Issues:

1. Whether the belated filing of the notice of appeal by petitioners was justifiable.

2. Whether the RTC correctly denied the motion for extension of time to file notice of appeal and declared its October 7, 2005 decision final and executory.

### Court's Decision:

**Resolution of Each Issue:**

1. **Justifiability of Belated Appeal:**

- **Court's Analysis:** The Supreme Court ruled that the period for filing an appeal is jurisdictional and must be followed strictly as per the rules. A claimed incapacitation of their counsel without sufficient proof does not warrant exceptions. The allegation of stroke was unsupported by a medical certificate, and the same counsel filed a withdrawal later, countering the claim of incapacitation.

- **Court's Conclusion:** The petitioners' filing of the notice of appeal beyond the reglementary period was unjustifiable.

2. **Denial of Motion and Definitive RTC Decision:**

- **Court's Analysis:** The motion for extension to file a notice of appeal is explicitly not allowed by Section 3, Rule 41. The missed appeal deadline due to the denied extension rendered the later-filed notice of appeal invalid. Procedural rules, especially those governing timelines for appeals, must be observed strictly. Furthermore, the action for redemption dated back to August 30, 1983, and the respondents had waited over two decades for resolution.

- **Court's Conclusion:** RTC's denial of the motion for extension and declaration of its decision as final and executory were proper. The court further noted that procedural rules could only be relaxed under exceptional circumstances which were not present in this case.

**Doctrine:**

- **Strict Compliance Required for Appeals:** The perfection of an appeal within the prescribed period is jurisdictional, and non-compliance results in the finality of the decision.

- **No Extension for Notice of Appeal:** Section 3, Rule 41 of the Rules of Civil Procedure prohibits motions for extensions of time to file notices of appeal.

- **Hierarchy of Courts:** Direct invocation of the Supreme Court's original jurisdiction to issue writs should only be for special, compelling reasons.

**Class Notes:**

- **Key Elements:**

1. **Jurisdictional Requirement:** Appeals must be filed within a strict period, and failing this results in the decision becoming final.

2. **Rules of Procedure:** Section 3, Rule 41 prohibits extensions for filing notices of appeal.

3. **Substantial Compliance:** Exceptionally allowed in rare and extraordinary situations.

4. **Hierarchy of Courts**: Direct petitions to the Supreme Court require significant grounds.

- **Statutes Cited**:

- **Section 3, Rule 41, Rules of Civil Procedure**: No extension of time to file a notice of appeal allowed.

- **Section 13, Rule 41**: Trial courts may dismiss appeals filed out of time.

**Historical Background**:

- This case illustrates the importance of adhering strictly to procedural rules for filing appeals to maintain judicial efficiency and order. It underscores the careful balance between procedural strictness and substantial justice, highlighting the judiciary's endeavor to prevent procedural delays while ensuring fairness. The prolonged process that started in 1983 and the court's stance against procedural leniency in this case reaffirm the significance of finality in judgments.