

**\*\*Title:\*\***

Lee and Aggabao v. Regional Trial Court of Quezon City, Branch 85

**\*\*Facts:\*\***

On September 24, 1980, a petition for letters of administration of the intestate estate of Dr. Juvencio P. Ortañez was filed, which included 2,029 shares of stock in the Philippine International Life Insurance Company (Philinterlife). Juliana, Jose, and Rafael Ortañez, as the decedent's legitimate family, later extrajudicially settled and partitioned his estate including the Philinterlife shares which were subsequently sold to the Filipino Loan Assistance Group (FLAG). This occurred before Ma. Divina Ortañez, an illegitimate child of the decedent, was appointed special administratrix for these shares.

Jose Ortañez's motion for the approval of the sale and release of private respondent as special administratrix was denied by the trial court on August 11, 1997, and the extrajudicial settlement was partly voided on August 29, 1997. This decision was upheld by the Court of Appeals and the Supreme Court.

On July 6, 2000, a writ of execution was ordered to:

1. Confirm the nullity of the sale of the shares to FLAG.
2. Reinstate the shares in the estate's name.
3. Issue new stock certificates to the estate.
4. Confirm Ma. Divina Ortañez-Enderes's rights as special administratrix.
5. Ensure Philinterlife complies within three days.

The writ was resisted by petitioners. A certiorari petition by petitioners to the Court of Appeals was dismissed, leading to their elevation to the Supreme Court, which affirmed the trial court and Court of Appeals' orders on February 23, 2004.

On April 27, 2004, petitioners' omnibus motion for reconsideration and referral to the en banc was denied for lack of merit on May 26, 2004. The decision became final on July 9, 2004. An alias writ of execution was issued on October 1, 2004. Petitioners filed a motion on October 15, 2004, to suspend execution on grounds of supervening events, which they argued included a revoked appointment of private respondent as special administratrix.

Private respondent filed an omnibus motion citing petitioners in indirect contempt for refusing the alias writ's execution. Supporting documents were not certified, but the court proceeded due to no objections from petitioners.

**\*\*Issues:\*\***

1. Whether petitioners' persistent non-compliance constituted indirect contempt.
2. Whether the petitioners' motion to suspend execution by reason of supervening events was justified and proper.
3. Whether the private respondent engaged in forum-shopping by filing similar motions across different courts.
4. Whether punitive action, including disbarment of petitioners' counsel, was appropriate.

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

1. **\*\*Indirect Contempt:\*\***

- The Court found petitioners Jose C. Lee and Alma Aggabao guilty of indirect contempt for failing to comply with the alias writ. Their persistent refusal, after numerous directives from the trial court, Court of Appeals, and Supreme Court, demonstrated defiance that impeded the proper administration of justice.

2. **\*\*Motion to Suspend Execution:\*\***

- The Court rejected petitioners' motion citing that the revocation of private respondent as special administratrix was not a supervening event since it preceded the final decision, thus offering no legitimate ground for suspending the writ's execution.

3. **\*\*Forum-Shopping:\*\***

- The Court ruled no forum-shopping occurred. The contempt charge was correctly filed given the Supreme Court's directive, and private respondent did not engage conflicting motions.

4. **\*\*Disbarment & Administrative Charges:\*\***

- The Court refers the charge against petitioners' counsel, Atty. Teodorico Fernandez, to the Commission on Bar Discipline of the Integrated Bar of the Philippines for investigation.

**\*\*Doctrine:\*\***

- **\*\*Doctrine of Finality of Judgment:\*\*** Decisions that reach finality must be implemented without delay. The immutability of final judgments not only prevents re-litigation but ensures execution as originally intended, barring exceptional circumstances such as clerical errors, void judgments, or significant post-judgment changes that render execution unjust.

- **\*\*Contempt of Court:\*\*** Actions that defy court orders and impede justice constitute contempt, punishable to preserve court authority and ensure lawful compliance.

**\*\*Class Notes:\*\***

- **\*\*Immutability of Final Judgments:\*\*** Essential for legal finality and justice enforcement, unless under clerical correction, void judgment, or post-finality events significantly altering equity of execution.
- **\*\*Contempt of Court:\*\*** Defined under Rule 71 specifically for disobedience to court orders, interference with proceedings, or actions impeding justice.

**\*\*Relevant Legal Statutes/Provisions:\*\***

- Rule 71, Section 3: Defines acts qualifying for indirect contempt.
- Section 7, Rule 71: Outlines penalties for indirect contempt.
- Rule 139-B, Section 1: Governs disciplinary authority over lawyers by the Integrated Bar of the Philippines.

**\*\*Historical Background:\*\***

The case highlights the complex judicial processes concerning estate administration and the persistent struggle in enforcing court orders across multiple levels of the judiciary. It reflects tensions between legitimate and illegitimate heirs, corporate governance issues, and the finality of judicial decisions against persistent litigation resistance, contributing significantly to Philippine jurisprudential standards on estate administration and contempt proceedings.