

**\*\*Title:\*\*** Valderrama v. People of the Philippines and Vigden, G.R. No. 217456

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

On July 16, 2004, four Informations for grave oral defamation were filed against Deogracia M. Valderrama (petitioner) by the City Prosecutor of Quezon City, following a complaint from Josephine ABL Vigden (respondent). During the trial on April 12, 2012, while Vigden was present, the private prosecutor was absent due to a medical emergency. As a result, the Metropolitan Trial Court (MeTC) waived the prosecution's additional evidence presentation and required a formal offer of documentary evidence within five days.

The prosecution failed to comply with this directive. Subsequently, on May 8, 2012, Vigden filed a Very Urgent Motion to Reconsider, citing the private prosecutor's health issues as the reason for the delay. Valderrama opposed this motion, arguing procedural defects, including the absence of the public prosecutor's conformity, a defective notice of hearing, and an untimely filing beyond the 15-day limit set by Section 1 of Rule 37 of the Rules of Court.

The MeTC granted the Motion to Reconsider on July 16, 2012, allowing the prosecution to present evidence on November 22, 2012, a date previously scheduled for the defense. Valderrama's motion for reconsideration of this order was denied on August 31, 2012.

Valderrama then filed a petition for certiorari with the Regional Trial Court (RTC), which dismissed the petition on May 3, 2013, finding no grave abuse of discretion by the MeTC. The Court of Appeals (CA) upheld this decision, leading Valderrama to elevate the case to the Supreme Court (SC), asserting grave abuse of discretion due to the procedural lapses in granting Vigden's Motion to Reconsider.

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

1. Whether the Metropolitan Trial Court (MeTC) committed grave abuse of discretion in granting the Motion to Reconsider, considering the alleged procedural defects and violations.
2. Whether the absence of the public prosecutor's conformity rendered the Motion to Reconsider void.
3. Whether the lack of proper notice and hearing rendered the Motion to Reconsider defective.
4. Whether the filing of the Motion to Reconsider beyond the 15-day reglementary period invalidated it.

**Court's Decision:**

The SC granted Valderrama's petition. The key points in the SC's decision include:

1. **Public Prosecutor's Conformity:**

- Rule 110, Section 5 of the Rules of Court demands that all criminal actions be under the public prosecutor's direction and control. The absence of the public prosecutor's conformity means the Motion to Reconsider was ineffectual as the private party lacked the legal standing to prosecute the criminal aspect of the case.

2. **Notice and Hearing:**

- Rule 15, Sections 4 and 5 of the Rules of Court mandate that motions set for hearing must inform the adverse party of the time and date. Failure to comply renders the motion a "useless piece of paper." In this case, Vigden's motion lacked proper notice and a specific hearing date, violating the mandatory rules.

3. **Timeliness:**

- Motions for reconsideration must be filed within the 15-day period as stated in Rule 37, Section 1 of the Rules of Court. The private prosecutor filed the motion late, making it procedurally defective.

Given these procedural shortcomings, the SC found the MeTC to have acted with grave abuse of discretion by granting the defective Motion to Reconsider, and thus, it reversed the decisions of the CA and RTC. The SC remanded the case back to the MeTC for proper disposition.

**Doctrine:**

- **Necessity of Public Prosecutor's Conformity:** Any criminal action must be prosecuted under the direction and control of the public prosecutor. (Rule 110, Section 5, Rules of Court).

- **Mandatory Notice Requirements:** All motions requiring a hearing must include a notice directed to the adverse party specifying the hearing's time and date (Rule 15, Sections 4 and 5, Rules of Court). Non-compliance renders the motion fatally defective.

- **Non-extendibility of Filing Period:** Motions for reconsideration must adhere to a strict 15-day filing period, beyond which filings are void (Rule 37, Section 1, Rules of Court).

**Class Notes:**

- **Rule 110, Section 5 of the Rules of Court:** Public prosecutor's control in criminal actions.

- **Rule 15, Sections 4 & 5 of the Rules of Court**: Mandatory hearing notice requirements.
- **Rule 37, Section 1 of the Rules of Court**: Non-extendibility of periods for filing motions for reconsideration.
- **Definition of Grave Abuse of Discretion**: A capricious and whimsical exercise of judgment tantamount to lack of jurisdiction, often infringing due process.

**Historical Background:**

The procedural rigors and requirements emphasized in this case reflect a consistent historical emphasis on ensuring both sides in a trial are afforded fair opportunities to present their cases. This case demonstrates the judiciary's function of balancing procedural technicalities with the higher goal of substantial justice and ensuring due process for the accused. The persistence of such doctrines underscores the judicial commitment to maintaining a well-ordered legal process, crucial for upholding rule of law principles in the Philippines.