

Title:

People of the Philippines v. Metropolitan Trial Court of Quezon City, Branch 32, and Isah V. Red

Facts:

- **January 30, 1995**: The State filed an information for libel against Isah V. Red in the Regional Trial Court (RTC) of Quezon City. The case was docketed as Criminal Case No. 95-60134 and raffled to Branch 82.
- **February 3, 1995**: Red moved to quash the information, asserting that the RTC lacked jurisdiction to try the case, invoking RA 7691, which transferred jurisdiction to first-level courts for offenses punishable by imprisonment not exceeding six years.
- **March 29, 1995**: The RTC found merit in the motion and remanded the case to the Quezon City Metropolitan Trial Court (MetroTC), which then docketed it as Case No. 43-00548 and assigned it to Branch 43.
- **August 1, 1995**: The private prosecutor filed a “Manifestation and Motion to Remand” the case back to the RTC, urging that Article 360 of the Revised Penal Code vests jurisdiction in the RTC for libel cases.
- **August 14, 1995**: MetroTC denied the motion to remand, reasoning that RA 7691 impliedly repealed the relevant provisions of the Revised Penal Code.
- **September 7, 1995**: MetroTC denied the private prosecutor’s motion for reconsideration.
- **October 18, 1995**: MetroTC denied another motion to remand and directed the prosecution to present its next witness.

Issues:

1. Whether the RTC or MetroTC has exclusive original jurisdiction over libel cases in light of RA 7691 and Article 360 of the Revised Penal Code.
2. Whether the orders issued by MetroTC denying the remand to RTC are void for lack of jurisdiction.
3. Whether venue in libel cases is merely procedural or jurisdictional.

Court’s Decision:

1. Jurisdiction over Libel Cases:

- The Supreme Court reaffirmed the principle that RTCs have exclusive original jurisdiction over libel cases as prescribed by Article 360 of the Revised Penal Code despite RA 7691, which generally redistributed jurisdiction to first-level courts for less serious crimes.
- SC cited previous rulings and administrative orders supporting the exclusive jurisdiction

of the RTC over libel cases.

****2. Validity of MetroTC Orders**:**

- The SC declared the orders issued by MetroTC denying the remand to RTC void, as they were issued without jurisdiction.
- Only final orders disposing of a case's merits can become final and executory. Interlocutory orders, such as those in this case, can be contested and are impervious to finality.

****3. Jurisdictional Nature of Venue in Criminal Cases**:**

- Unlike civil cases, in criminal cases, venue is jurisdictional. Thus, the venue for libel cases as specified in Article 360 must be strictly observed.

Doctrine:

- ****Exclusive Jurisdiction of RTCs over Libel Cases**:** RTCs hold exclusive jurisdiction for handling libel cases despite general jurisdictional amendments under RA 7691.
- ****Jurisdiction-Trump Principle**:** A general law cannot supersede a specific provision in a special statute unless a clear legislative intent exists.
- ****Setting of Venue in Criminal Law**:** Venue in criminal cases such as libel is jurisdictional and not merely procedural.

Class Notes:

- ****Key Legal Elements**:**
- ****Article 360 of the Revised Penal Code**:** Mandates that libel cases must be filed in RTCs.
- ****RA 7691**:** Amended the Judiciary Reorganization Act but does not extend to override the jurisdiction of RTCs in specific crimes such as libel.
- ****Jurisdictional Nature of Venue in Criminal Law**:** Venue concerns jurisdiction in criminal cases and must be strictly adhered to.
- ****Critical Statutory Citations**:**
- ****Article 360, Revised Penal Code**:** Specific designation of RTCs for libel cases.
- ****RA 7691 (Section 2)**:** General jurisdiction reallocation does not affect libel jurisdiction per Article 360.
- ****Judiciary Reorganization Act**:** Establishes the framework of court jurisdictions in the Philippines.

Historical Background:

- The context of this case arose from jurisdictional shifts introduced by RA 7691, which

expanded the jurisdiction of lower courts but had ambiguities about its application to specific cases such as libel.

- Historical precedence, administrative orders, and clear statutory provisions solidified RTCs as the forums for libel adjudications, rejecting the application of newer jurisdictional statutes when in conflict with specific criminal jurisdiction mandates.