

****Case Title:****

Franklin M. Drilon as President and in Representation of the Liberal Party of the Philippines (LP), et al., Petitioners, vs. Hon. Jose de Venecia Jr., et al., Respondents. Senator Ma. Ana Consuelo A.S. Madrigal, Petitioner, vs. Senator Manuel Villar et al., Respondents.

****Facts:****

- ****August 2007:**** The Senate and the House of Representatives elected their contingents to the Commission on Appointments (CA).
- Senate Contingents include members from varied political parties.
- House Contingents include ten members from Lakas-CMD and KAMPI, amongst others, but excluded the Liberal Party (LP).
- ****Second Week of August 2007:**** LP members approached Speaker Jose de Venecia seeking a seat on the CA, to which he responded he would study the matter.
- ****September 3, 2007:**** During a House session, Representative Tañada requested one CA seat for the LP. Representative Neptali Gonzales II requested time for a study.
- ****September 10, 2007:**** Rep. Tañada formalized the seat request through a letter to the Secretary General and reminded the Speaker. He stated that the LP should be represented as it had at least 20 members in Congress.
- ****October 15, 2007:**** The Legal Department had yet to produce a report due to a lack of required documents.
- ****October 31, 2007:**** A petition was filed by Franklin M. Drilon and others (G.R. No. 180055) seeking prohibition, mandamus, and quo warranto, citing constitutional entitlement to a CA seat.
- ****December 6, 2007 & February 18, 2008:**** Respondents filed comments opposing the petition, arguing constitutional adherence and procedural objections.
- ****April 17, 2008:**** Senator Madrigal, separately, raised issues of over-representation by some parties and under-representation by the LP in the CA.
- ****June 13, 2008:**** Madrigal filed a separate petition (G.R. No. 183055) seeking prohibition and mandamus, emphasizing unconstitutional CA composition.
- ****July 1, 2008:**** The Supreme Court consolidated both petitions (G.R. No. 180055 and G.R. No. 183055).
- ****August 15, 2008:**** Petitioners in G.R. No. 180055 moved to withdraw their petition as their issues were resolved with the designation of Rep. Umali to the CA.

****Issues:****

1. Whether the LP with at least 20 members is constitutionally entitled to a CA seat.
2. Whether the House respondents committed grave abuse of discretion by depriving the LP

of proportional representation.

3. Whether actions taken by the CA are null and void due to unconstitutional composition.

4. Whether the second petition must be dismissed for lack of direct injury to Senator Madrigal and her failure to exhaust the primary jurisdiction of Congress.

Court's Decision:

1. **LP's Entitlement to a Seat in the CA:**

- Mooted as the LP's main contention about CA representation was resolved after Rep. Umali was designated to the CA.

2. **Grave Abuse of Discretion by House Respondents:**

- Mooted with the resolution leading to the withdrawal of G.R. No. 180055.

3. **Validity of CA's Actions:**

- Included in the withdrawal of the first petition, rendering it moot before the Court.

4. **Senatorial Petition (G.R. No. 183055):**

- Dismissed. The petitioner lacked standing and failed to show direct injury. The failure to first seek resolution within the Senate and House of Representatives constituted a violation of the doctrine of primary jurisdiction. Additionally, the Court refused to resolve factual disputes regarding party affiliations.

Doctrine:

- **Mootness:** The court acknowledges mootness when issues presented are resolved outside the judicial process, making court intervention unnecessary.

- **Primary Jurisdiction:** Internal congressional disputes, such as allocation of CA seats, must first be addressed within the legislative body per the Constitution.

- **Standing in Judicial Review:** Petitioners must show direct and personal injury from the disputed actions.

Class Notes:

1. **Mootness Doctrine:** Judicial power ceases where controversies are resolved or are removed from the court's purview.

2. **Primary Jurisdiction:** Prior authoritative resolution within administrative or legislative avenues before judicial review.

3. **Standing to Sue:** An actionable claim requires direct injury and substantial interest by the petitioner.

4. **Proportional Representation:** Compliance with constitutional requirements for

representing political party strength in specific governmental bodies.

5. **Constitutional Mechanics:** Section 18, Article VI - mandates proportional political party representation in the Commission on Appointments.

Historical Background:

The case occurred in the backdrop of transitioning political dynamics in Philippine Congress post-2007 elections. The dispute reflects ongoing tensions and the mechanics of political representation amidst legislative complexities. The petitioners invoked constitutional stipulations to assert political equity within a critical legislative body designed to balance executive appointments, underscoring fundamental operational principles within a functioning democracy.