

Title:

Ethel, Emmie, Elvie, Earlyn, Evelyn Acampado, and Katipunan M. De Los Reyes vs. Spouses Lourdes R. Cosmilla and Felimon Cosmilla, and Lorelie Cosmilla (770 Phil. 389)

Facts:

This case is rooted in a Petition for the Declaration of the Nullity of Document filed by Spouses Lourdes and Felimon Cosmilla and Lorelie Cosmilla against Ethel, Emmie, Elvie, Earlyn, Evelyn Acampado, and Katipunan M. De Los Reyes in the Regional Trial Court (RTC) of Kalibo, Aklan, Branch 6.

1. **Initial Complaint**: Respondents claimed that the sale of their share in a property was invalid due to a forged Special Power of Attorney (SPA).
2. **RTC Decision**: On March 31, 2005, the RTC dismissed the complaint, stating that respondents failed to prove by preponderance of evidence that the SPA signatures were forged. Additionally, respondents were ordered to pay transportation expenses and attorney's fees amounting to P25,000.00 and litigation expenses of P21,772.50.
3. **Motion for Reconsideration**: Respondents filed a Motion for Reconsideration on May 6, 2005. However, the RTC denied it as pro forma in an Order dated May 16, 2005 due to failure to comply with notice of hearing requirements of Sections 4 and 5 of Rule 15 of the Revised Rules of Court, thus deeming the decision final and executory.
4. **Court of Appeals Decision**: Respondents then filed a Petition for Certiorari, Prohibition, and Mandamus with the Court of Appeals, including a request for a Preliminary Injunction and TRO, against the RTC's May 16, 2005 Order. The Court of Appeals initially dismissed the petition for lack of merit in a decision dated October 27, 2006.
5. **Motion for Reconsideration at Court of Appeals**: On June 28, 2007, the Court of Appeals reversed its prior decision, allowing procedural flexibility and directing the RTC to resolve the Motion for Reconsideration filed by the respondents on its merits.
6. **Final Motion Denial**: The petitioners filed a Motion for Reconsideration against the Court of Appeals' June 28, 2007 Resolution. On August 19, 2011, the Court of Appeals denied this motion.

Issues:

1. Whether the Court of Appeals erred in setting aside the RTC's Order declaring the Motion

for Reconsideration pro forma.

2. Whether the Court of Appeals erred in reconsidering its own decision dismissing the Petition for Certiorari, Prohibition, and Mandamus initially filed by the respondents.

Court's Decision:

The Supreme Court granted the petition.

1. **Compliance with Procedural Rules**: The court underscored the necessity of strict compliance with procedural rules, specifically Sections 4 and 5 of Rule 15 of the Revised Rules of Court. These sections mandate proper notice and hearing procedures for motions.

2. **Fatal Defect in Motion**: The absence of a notice of hearing appended to the respondent's Motion for Reconsideration rendered it pro forma, constituting a fatal defect. Thus, the RTC correctly declared the motion a mere scrap of paper, which could not halt the reglementary period for appeal, allowing the original RTC decision to become final and executory.

3. **Finality of Judgments**: The Court emphasized the principle that litigation must reach an end once a judgment becomes final. It reasoned that both the winning and losing parties expect a degree of finality, and delays could undermine judicial effort, time, and resources already expended.

Doctrine:

1. **Strict Compliance with Notice and Hearing Requirements for Motions**: A motion failing to comply with the required notice and hearing provision is pro forma and deserves no judicial cognizance.

2. **Finality of Judgments**: Once a decision is deemed final and executory, it should be respected to ensure justice and judicial efficiency.

Class Notes:

1. **Elements/Concepts**:

- **Pro Forma Motion**: A motion lacking compliance with procedural notice requirements.

- **Revised Rules of Court Sections 4, 5, and 6 of Rule 15**: Governs the procedural requirements for the notice of hearing for motions.

- **Finality of Judgment**: A principle ensuring judicial decisions gain finality to prevent indefinite litigation.

2. **Statutes/Provisions**:

- **Rule 15, Section 4**: Written motions must be set for hearing.
- **Rule 15, Section 5**: Notice of hearing must be specific and addressed to concerned parties.
- **Rule 15, Section 6**: Proof of service for motions required.

Historical Background:

This case exemplifies the enduring necessity for strict procedural compliance in the Philippine judiciary system to uphold principles of due process and equitable justice for all parties involved. The Supreme Court's decision reaffirms the finality of judgments as a cornerstone of judicial efficiency and fairness.