

Title:

Acampado v. Cosmilla

Facts:

Step-by-Step Facts:

1. **Initial Complaint**:

- Respondents Spouses Lourdes and Felimon Cosmilla and Lorelie Cosmilla filed a Petition for the Declaration of Nullity of Document against petitioners Ethel, Emmie, Elvie, Earlyn, and Evelyn Acampado in the Regional Trial Court (RTC) of Kalibo, Aklan, Branch 6.
- Respondents alleged that the sale of their share in the subject property was effectuated through a forged Special Power of Attorney (SPA).

2. **RTC Proceedings**:

- After the trial on the merits, the RTC dismissed the complaint on 31 March 2005, stating that respondents failed to prove by a preponderance of evidence that the SPA was forged.
- The RTC ordered respondents to pay P25,000.00 for transportation expenses and attorney's fees, and P21,772.50 for litigation expenses.

3. **Motion for Reconsideration**:

- On 6 May 2005, respondents filed a Motion for Reconsideration but failed to comply with the notice of hearing requirement under Sections 4 and 5, Rule 15 of the Revised Rules of Court.
- On 16 May 2005, the RTC declared the Motion for Reconsideration pro forma and final because the period for appeal had expired.

4. **Appeals Process**:

- Respondents filed a Petition for Certiorari, Prohibition, and Mandamus with the Court of Appeals (CA), seeking to annul the 16 May 2005 RTC Order.
- On 27 October 2006, the CA initially dismissed the petition for lack of merit.
- Respondents filed a Motion for Reconsideration with the CA.
- The CA reversed its earlier dismissal on 28 June 2007, relaxing procedural rules and ordering the RTC to resolve the Motion for Reconsideration on the merits.
- Petitioners' subsequent Motion for Reconsideration was denied by the CA on 19 August 2011.

5. **Supreme Court Proceedings**:

- Petitioners filed a Petition for Review on Certiorari with the Supreme Court, challenging

the CA's resolutions.

Issues:

1. **Procedural Compliance**: Did the respondents' Motion for Reconsideration meet the requirements as stated in Sections 4 and 5 of Rule 15 of the Revised Rules of Court?
2. **Finality of Judgment**: Did the RTC correctly declare the respondents' motion pro forma, rendering its decision final and executory?
3. **Due Process and Notice**: Did the lack of notice and hearing infringe upon the due process rights of the petitioners?

Court's Decision:

The Supreme Court granted the petition, reversing and setting aside the CA resolutions. The RTC's order was reinstated, which declared the respondents' Motion for Reconsideration pro forma.

Issue-by-Issue Analysis:

1. **Procedural Compliance**:

- **Ruling**: The Court found that the Motion for Reconsideration failed to comply with the mandatory notice and hearing requirements under Sections 4 and 5 of Rule 15.
- **Resolution**: The Motion was correctly declared pro forma and invalid as it did not stall the running of the appeal period.

2. **Finality of Judgment**:

- **Ruling**: The RTC's decision became final and executory because the Motion for Reconsideration did not interrupt the prescriptive period for filing an appeal.
- **Resolution**: The Court emphasized the importance of procedural rules in enforcing the finality of judgments to ensure the swift administration of justice.

3. **Due Process and Notice**:

- **Ruling**: The necessary statutory requirements for due process were not met since the respondents' motion was filed without proper notice and opportunity for petitioners to contest.
- **Resolution**: The Court held that the respondents were given ample opportunity to be heard; the defects in their motion warranted the RTC and CA decisions as declared void.

Doctrine:

1. **Mandatory Compliance with Motion Requirements**: Motions must comply with the procedural requirements of notice and hearing to be valid. Failure to do so renders the

motion a worthless piece of paper.

2. **Finality of Judgment**: Once a judgment becomes final and executory, it cannot be altered, amended, or set aside, except for void judgments or other exceptions recognized by law.

Class Notes:

1. **Key Elements**:

- **Procedural Requirement for Motions**:

- Sections 4 and 5 of Rule 15, Revised Rules of Court: Notice, Hearing, Proof of Service.

- **Finality of Judgment**: A judgment becomes final and executory if no valid motion for reconsideration or appeal is filed within the reglementary period.

2. **Statutory Provisions**:

- **Rule 15, Rev. Rules of Court, Secs. 4, 5, and 6**

- **Finality Doctrine**: Once a judgment is final and executory, it cannot be litigated or delayed further.

Historical Background:

- This case highlights the judiciary's emphasis on procedural due process and the principles of finality in litigation, ensuring that the rights of all parties are respected while maintaining the efficiency and integrity of the legal system. The ruling enforces strict adherence to procedural rules and serves as a caution against lax procedural compliance that can impede judicial processes.