Title: People of the Philippines vs. Governor Antonio Kho and Arnel Quidato

Facts:
– Congressman Tito Espinosa was ambushed and killed. An Information for Murder was filed against Blas Rosario, Antonio Kho, Arnel Quidato, Rogelio Soriano, Jacinto Ramos, and John Doe in the Regional Trial Court (RTC) of Quezon City, Branch 88, presided over by Judge Bersamin.
– The case was initially assigned to Judge Tirso Velasco, but due to a motion for disqualification filed by the prosecution, it was transferred to Judge Bersamin.
– The accused applied for bail, and a hearing commenced on September 25, 1998, where the prosecution presented witnesses opposing bail.
– On April 15, 1996, Judge Bersamin denied the bail application, determining that the evidence against Kho and Quidato was strong.
– Kho and Quidato filed a second motion for bail on May 10, 1996, which was also denied for lack of new evidence.
– During the trial on merits, while the defense was presenting evidence, Kho and Quidato filed a third bail application.
– On November 18, 1997, Judge Bersamin reversed the previous denials and granted bail, citing that the prosecution couldn't establish a direct link between Kho and Quidato and the killing based on Rosario's extra-judicial confession.
– The prosecution orally moved for Judge Bersamin's inhibition, accusing him of bias and partiality. A written motion for inhibition was reiterated on December 1, 1997.
– On January 8, 1998, Judge Bersamin inhibited himself from the case to dispel bias suspicion, despite stating the reasons for the inhibition were flimsy.
– The Court of Appeals reversed Judge Bersamin's inhibition, citing the belated nature of the motion and warning against forum-shopping for a sympathetic judge.

Issues:
1. Did the Court of Appeals err in ruling that Judge Bersamin's inhibition was not an exercise of sound discretion?
2. Did the Court of Appeals err in finding that the inhibition had no just or valid cause?

Court's Decision:
– The Supreme Court agreed with the Court of Appeals that Judge Bersamin did not exercise sound discretion in inhibiting himself from the case.
– It emphasized that a judge's voluntary inhibition should be based on just and valid reasons to prevent prejudices against the proceedings and maintain public confidence in the

judiciary.
– Mere allegations of bias without clear evidence aren't enough for inhibition.
– The panel noted that Judge Bersamin's earlier bail order was a reasoned decision, and no convincing evidence showed he would unjustly favor the accused.
– Furthermore, it stated that replacing a trial judge at an advanced trial stage poses prejudice risks, as the trial judge gains unique insights from observing witnesses directly.
– Thus, Judge Bersamin was ordered to continue presiding over the case.

Doctrine:
– Rule 137 of the Revised Rules of Court outlines the basis for a judge's inhibition, distinguishing between compulsory and voluntary inhibition. A judge's voluntary inhibition should deal with just and valid reasons, not mere allegations of bias sans evidence.
– The judiciary's impartiality is essential. An order of inhibition should not be granted merely based on a party's strategy to gain advantage in the proceedings.

Class Notes:
– Voluntary Inhibition of Judges: Judges may inhibit themselves from a case for just or valid reasons other than those mandating disqualification (Rule 137, Sec. 1).
– Evidence Requirement for Bias: Bias must be established through clear, convincing evidence beyond mere allegations or suspicions.
– Trial Judge Insights: The trial judge's observations directly from the stand play a crucial part in credibility assessments of witnesses.

Historical Background:
– The case provides insight into ensuring impartiality within the Philippine judiciary while balancing fairness and avoiding manipulation of judicial processes for strategic gains.
– The case also reflects on historical issues of political violence and the corresponding efforts of courts to maintain judicial integrity in politically charged environments.