

Title:

People of the Philippines vs. Honorable Nazar U. Chaves and Miguel P. Paderanga

Facts:

- In October 1986, Informations for Multiple Murder were filed against several individuals (Felipe Galarion, Manuel Sabit, Cesar Sabit, Julito Ampo, Eddie Torion, and several unidentified John, Peter, and Richard Does) for the killing of the Bucag family in Gingoog City.
- The case was transferred from the Regional Trial Court (RTC) of Gingoog City to Cagayan de Oro City as Criminal Case No. 86-39 through Administrative Order No. 87-2-244, presided over by Judge Nazar U. Chaves.
- Felipe Galarion was tried and convicted, while the other accused remained at large.
- Felizardo Roxas was identified as another suspect in October 1988, leading to an amended information on October 6, 1988, which added Roxas as a co-accused. He was represented by Miguel Paderanga.
- Roxas's counter-affidavit during a preliminary investigation implicated Atty. Paderanga, amending the information again to include Paderanga as an accused.
- During the trial, the prosecution planned to call Roxas as its witness. The court sustained Paderanga's objection on May 19, 1993, based on Roxas's right against self-incrimination.
- The prosecution sought Roxas's discharge as a state witness and intended to present Julito Ampo similarly.
- On June 3, 1993, the trial court denied the prosecution's reconsideration motion, setting a hearing for Roxas's discharge as a state witness.
- On June 29, 1993, the court allowed the prosecution to present Roxas to satisfy conditions for a state witness, but Paderanga objected.
- On July 15, 1993, the court's Omnibus Order granted Paderanga's reconsideration motion stating only Roxas's sworn statement could be considered at this stage.
- The prosecution's further reconsideration motion was denied on September 23, 1993.
- The prosecution filed a certiorari, prohibition, and mandamus petition with the Court of Appeals on November 17, 1993, which was dismissed on November 7, 1997.
- This led to a petition for review to the Supreme Court, focusing on the Orders relating to witness presentation and discharge.

Issues:

1. Whether the trial court's June 3, 1993, order became final due to lack of appeal.
2. Whether the trial court erred by limiting evidence solely to the sworn statements of proposed state witnesses when deciding the discharge motion.

Court's Decision:

- The Supreme Court ruled the trial court's June 3, 1993, order was interlocutory and not appealable, meaning it could still be challenged via certiorari and that the certiorari petition was filed within a reasonable period. Thus, the Court of Appeals erred in declaring the Order final.
- It was determined that Roxas and Ampo could voluntarily testify for the prosecution without needing formal discharge as state witnesses. The trial court was directed to verify their voluntariness to testify, ensuring no infringement on their rights.
- In addressing the discharge motion, the court held that testimony could be presented to prove if statutory conditions were met—the ruling thus allowed the prosecution to use oral testimony.

Doctrine:

- An interlocutory order may be challenged by certiorari if it is not the final disposition of the case.
- An accused's testimony about voluntary testimony can be allowed without their formal discharge as a state witness, with requisite safeguards against self-incrimination.
- The evidentiary requirements for state witness discharge do not categorically exclude accused individuals' testimonies.

Class Notes:

- Interlocutory orders are not appealable but can be challenged via certiorari.
- Rule 119, Section 17, Revised Rules of Criminal Procedure requires presentation of evidence and sworn statements to discharge an accused as a state witness.
- Accused individuals must voluntarily testify and understand the implications to testify against co-defendants.

Historical Background:

- This case reflects procedural safeguards in Philippine law ensuring an accused's rights, particularly against self-incrimination, while balancing the prosecution's ability to utilize willing co-accused testimonies. The procedural process in judicial submissions and appeals emphasizes the legal intricacies involving state witnesses.