

Title: **Corazon Macapagal v. People of the Philippines**

Facts:

1. **Initial Incident and Case Filing**: Corazon Macapagal was charged with Estafa for misappropriating P800,000 worth of jewelry. The specific accusation involved her failing to return or account for unsold jewelry given to her.
2. **RTC Decision**: On November 25, 2008, the Regional Trial Court (RTC) found Macapagal guilty of Estafa. The decision was received by Macapagal on January 13, 2009.
3. **Motion for Reconsideration**: Macapagal filed a Motion for Reconsideration and/or New Trial, which the RTC denied in an order dated May 20, 2009. She allegedly received this order on July 31, 2009.
4. **Notice of Appeal**: On August 3, 2009, Macapagal filed a Notice of Appeal, which the RTC denied on June 29, 2010, for being filed out of time.
5. **Petition for Review on Certiorari**: Macapagal brought a petition for review on certiorari to the Supreme Court under Rule 45, aiming to contest the RTC's denial of her appeal notice and her conviction for Estafa.

Issues:

1. **Procedural Appropriateness**: Whether Macapagal availed the correct procedural remedy in assailing the RTC's denial of her notice of appeal.
2. **Jurisdiction and Proper Forum**: Whether the Supreme Court is the appropriate forum for the petition.
3. **Compliance with Procedural Requirements**: Whether Macapagal complied with the Supreme Court's procedural rules in filing the petition.
4. **Right to Appeal and Compliance with Court Orders**: Examination of continuous non-compliance by Macapagal and her counsel with procedural rules and court's orders.

Court's Decision:

1. **Procedural Remedy**: The Supreme Court held that Macapagal availed the wrong remedy by filing a petition under Rule 45. The correct procedure was to file a special civil action under Rule 65, as per Sections 2 and 3, Rule 122 of the Revised Rules of Criminal Procedure.
2. **Hierarchy of Courts**: Even treating the petition as a certiorari under Rule 65, the Supreme Court dismissed it for violating the hierarchy of courts. Direct resort to the Supreme Court is permissible only for compelling reasons, which were absent here.
3. **Compliance Requirements**: The court noted Macapagal's failure to attach a certified true copy or duplicate original of the assailed decision and the order denying her motion for

reconsideration, a requirement under Rule 45 of the Rules of Court. This flaw was sufficient ground for dismissal.

4. **Non-Compliance and Repeated Disregard**: The Supreme Court found that Macapagal and her counsel's repeated disregard and non-compliance with procedural rules and multiple lawful orders of the Court justified dismissal. This included failure to submit an affidavit of service, valid certification of non-forum shopping, and failure to comply with directives for overdue submissions, leading to failure in procedural grounds.

Doctrine:

1. **Proper appellate procedure**: A petition for review under Rule 45 is appropriate for appealing a lower court's final decision or order, not for orders disallowing an appeal.
2. **Hierarchy of Courts**: Direct recourse to the Supreme Court is restricted, allowing only special, important, and compelling reasons.
3. **Strict compliance**: Strict adherence to procedural rules and requirements is fundamental. Non-compliance can be fatal to the petitioner's cause.

Class Notes:

1. **Rule 45 of Rules of Court**: This Rule is used for appeals from lower courts' decisions or final orders, requiring submission of certified copies of the assailed decision.
2. **Rule 65 of Rules of Court**: Special civil actions of certiorari or prohibition are appropriate for questioning interlocutory orders, where no appeal can be taken.
3. **Hierarchy of Courts Doctrine**: Direct appeals to the Supreme Court should demonstrate compelling reasons.
4. **Procedural Adherence**: Strict compliance with procedural rules is essential in legal processes, non-compliance results in procedural dismissals.
5. **Appeal Notice Timeline**: Appeals must be timely filed within 15 days from the judgment or the final order notice.

Historical Background:

- **Evolution of Procedural Rigidity**: Procedural rules have grown stricter, especially in the context of the Philippines' overcrowded dockets, necessitating adherence to facilitate efficient judicial processes.
- **Rule Revisions and Impact**: Amendments over time have emphasized proper observance, such as the 2004 amendments to the rules on notarial practice necessitating valid identification documents for affidavits.
- **Context within Filipino Judiciary**: This case reflects the broader emphasis within the Filipino judiciary to set a precedent that procedural rules must be rigorously observed to

prevent further clogging of court dockets and ensure judicial efficiency.