

Title:

Enrile v. Manalastas, Cedillo, Sr., and People of the Philippines (G.R. No. 746 Phil. 43)

Facts:

1. **Incident and Charges**:

- On January 18, 2003, a mauling incident took place outside the residence of Godofredo Enrile and Dr. Frederick Enrile in St. Francis Subdivision, Barangay Pandayan, Meycauayan, Bulacan.
- Josefina Guinto Morano, Rommel Morano, and Perla Beltran Morano claimed to be the victims and filed charges against the petitioners and Alfredo Enrile.
- Charges included frustrated homicide against Rommel (Criminal Case No. 03-275) and less serious physical injuries against Josefina (Criminal Case No. 03-276) and Perla (Criminal Case No. 03-277).

2. **MTC and Probable Cause**:

- The Municipal Trial Court (MTC) of Meycauayan, Bulacan found probable cause for less serious physical injuries against the petitioners and scheduled an arraignment for September 8, 2003.

3. **Procedural Developments**:

- The petitioners moved for reconsideration on August 19, 2003, arguing lack of evidence for the injuries requiring medical attention lasting 10 days or more.
- The MTC denied this motion on November 11, 2003, stating that it was barred by the Rules on Summary Procedure.
- Petitioners filed a motion to quash and to defer arraignment, both of which were denied by the MTC on February 11, 2004.
- The MTC maintained that the grounds for quashing were matters of defense to be addressed in a full trial.

4. **RTC and CA Rulings**:

- Upon denial from the MTC, petitioners filed a special civil action for certiorari in the Regional Trial Court (RTC) of Malolos, Bulacan, which was dismissed on May 25, 2004.
- The RTC asserted that issues raised were matters of defense and could only be resolved at trial.
- Petitioners' motion for reconsideration was also denied by the RTC on July 9, 2004.
- Subsequently, petitioners went to the Court of Appeals (CA), which dismissed their petition for certiorari and prohibition on August 31, 2004 for being the wrong legal remedy,

reaffirmed by rejecting their motion for reconsideration on December 21, 2004.

Issues:

1. **Legal Questions**:

- Whether the Court of Appeals erred in affirming the trial courts' denial of the motion to quash despite alleged deficiencies in the criminal complaints.
- Whether the injuries sustained by the complainants were not perpetrated by the petitioners.

Court's Decision:

1. **Rule on Certiorari and Interlocutory Orders**:

- The Supreme Court reiterated that the denial of a motion to quash is interlocutory and not appealable via certiorari; the recourse is to go to trial and appeal from the final judgment.

2. **Sufficiency of Complaints**:

- The complaints were deemed sufficient as they included all necessary elements of less serious physical injuries according to Article 265 of the Revised Penal Code. The averments were specific and aligned with statutory requirements.

3. **Factual Determination at Trial**:

- The court underscored that factual determinations such as the extent and duration of injuries are matters for trial, not for motion to quash or preliminary investigation phases.

Doctrine:

- **Interlocutory Orders**: Denial of a motion to quash is interlocutory and not independently appealable.
- **Sufficiency of Information**: A criminal complaint must meet the criteria set out in Section 6, Rule 110 of the Rules of Court and only needs to state ultimate facts, not evidentiary details.

Class Notes:

- **Elements of Less Serious Physical Injuries (Article 265, RPC)**:

1. Infliction of physical injuries.

2. Incapacity of the victim for labor for ten days or more, or required medical attendance for the same period.

- **Procedural Posture**:

- Interlocutory orders such as denial of motion to quash are not subject to certiorari; must proceed to trial and appeal.

- **Rules of Criminal Procedure**:
- Grounds and sufficiency for motions to quash (Section 3, Rule 117; Section 6, Rule 110).

Historical Background:

This case underlines the procedural nuances in Philippine criminal litigation and the delineation of interlocutory orders from final judgments, reinforcing the necessity for trial procedures before appellate review in criminal cases. The historical context reflects the judiciary's commitment to ensuring defense opportunities while adhering to procedural rules to prevent premature dismissal of charges.