

Title:

People of the Philippines vs. Enriquez and Salud, Jr. (90 Phil. 423)

Facts:

On April 17, 1951, Judge Juan P. Enriquez of the Court of First Instance of Batangas, Second Branch, promulgated a decision sentencing Fidel Salud Jr. to an indeterminate sentence ranging from six (6) years and one (1) day of prision mayor to twelve (12) years and one (1) day of reclusion temporal. Salud moved for reconsideration on May 2, 1951, arguing the court failed to recognize his minority (age 17-18) as a privileged mitigating circumstance that should reduce the penalty by one degree and did not consider his voluntary surrender as a mitigating circumstance.

On June 18, 1951, Judge Enriquez granted the motion, recognizing the mitigating circumstances and amending the sentence to an indeterminate range from one (1) year and one (1) day of prision correccional to six (6) years and one (1) day of prision mayor.

The prosecution filed for reconsideration of this amended judgment, which was denied. Subsequently, the Provincial Fiscal of Batangas filed a petition for certiorari with the Supreme Court, arguing that the respondent judge acted in excess of his jurisdiction by amending the judgment after the decision had become final and citing *People vs. Tamayo* (G.R. No. L-2233) to support the claim.

Issues:

1. Whether a motion for reconsideration can suspend the finality of judgment in a criminal case.
2. Whether Judge Enriquez acted within his jurisdiction in amending the original judgment post-finality.
3. Whether errors of law in the judgment can be grounds for modifying or setting aside the judgment via reconsideration without ordering a new trial.

Court's Decision:

The Supreme Court upheld the second judgment issued by Judge Enriquez, affirming his decision to consider the mitigating circumstances and amend the sentence.

Issue 1: Suspension of Finality

- The Court ruled that both a motion for new trial and a motion for reconsideration by the defendant can suspend the finality of a judgment, as errors of law in the judgment are grounds that can be cited for new trials. The rationale is that both types of motions are

meant to correct errors before the judgment becomes final, thus the time for appeal is interrupted accordingly.

Issue 2: Jurisdiction to Amend Judgment

- The Court found that since the motion for reconsideration was filed within the 15-day appeal period, the respondent judge had not acted in excess of jurisdiction by granting the motion and amending the judgment. The granting of this reconsideration and the subsequent modification of the judgment did not infringe on any legal procedural rule.

Issue 3: Grounds for Reconsideration without New Trial

- The ruling confirmed that errors of law in the judgment itself do not necessitate a complete new trial but can be addressed through reconsideration by the court. This principle rests on the aim to avoid unnecessary appeals by allowing trial courts to correct their judgments at this stage.

Doctrine:

1. **Finality of Judgment and Reconsideration:** A motion for reconsideration by the defendant, addressing errors of law, is treated as a motion for new trial in its ability to suspend the finality of judgment.
2. **Jurisdictional Authority:** A court can validly amend a judgment before it becomes final if a timely motion for reconsideration (or new trial) is filed, notwithstanding the nomenclature.
3. **Correcting Judgments without New Trials:** Legal errors in judgments can be corrected via reconsideration or modification without necessarily ordering a new trial if these errors do not impact the entirety of the trial proceedings.

Class Notes:

- **Key Concept/Element:** Finality of judgments can be paused by motion for reconsideration analogous to motions for new trial.
- **Statutory Provision:** Section 6 of Rule 118 and Section 2 of Rule 117 interpret the procedural handling of appeals and new trials.
- **Principle Application:** Understanding how the procedural rules apply to the suspension of judgment finality and the scope of judicial reconsideration can clarify the legal avenues available for addressing potential trial errors without reopening the entire case.

Historical Background:

This case sits in the larger context of post-World War II Philippines, a period characterized

by restructuring the legal system and ensuring stable judicial processes. It exemplifies the judiciary's efforts to balance finality in legal proceedings with fairness in correction of judicial errors, thus reflecting evolving norms within the Philippine legal framework.