

Title: Pagkalinawan vs. Gomez, G.R. No. L-24717, April 1969

Facts:

1. **Search Warrant Issued**: On February 4, 1964, the Court of First Instance of Manila, Branch II, under Judge Guillermo Santos issued a search warrant resulting in the seizure of an automobile suspected to be stolen property.
2. **Replevin Action Filed**: On February 7, 1964, Norberto L. Dayrit filed a replevin complaint in the Court of First Instance of Cebu against Nicanor B. Pagkalinawan, an NBI Supervising Agent, for the recovery of the seized car.
3. **Order for Replevin**: On February 8, 1964, Judge Amador E. Gomez of the Cebu Court ordered the Sheriff to take custody of the car. Pagkalinawan, holding the car under the search warrant from the Manila Court, expressed his inability to comply.
4. **Urgent Motion and Judicial Orders**: On February 12, 1964, Dayrit filed an urgent motion for Pagkalinawan to explain his non-compliance. Judge Gomez ordered Pagkalinawan to turn over the car, under threat of judicial coercion.
5. **Reconsideration Motion Denied**: Pagkalinawan filed a motion for reconsideration on February 14, 1964, which was denied on February 20, 1964.
6. **Supreme Court Petition**: Pagkalinawan filed for certiorari with the Supreme Court, alleging that Judge Gomez acted without or in excess of jurisdiction and with grave abuse of discretion.
7. **Preliminary Injunction**: The Supreme Court, on March 18, 1964, issued a preliminary mandatory injunction ordering the return of the car to Pagkalinawan pending resolution of the case.

Issues:

1. **Jurisdictional Overreach**: Whether the Cebu Court's replevin order, issued by Judge Gomez, acted outside its jurisdiction or with grave abuse of discretion by overriding a search warrant issued by the Manila Court.
2. **Custodia Legis**: Whether the car, seized and held under a valid search warrant by the Manila Court, could legally be replevied by another Court of concurrent jurisdiction.
3. **Interference Between Coordinate Courts**: Whether a Court of First Instance can make a ruling that affects the enforcement of an order from another Court of First Instance.

Court's Decision:

1. **Jurisdictional Overreach**: The Supreme Court held that Judge Gomez acted in excess of jurisdiction and with grave abuse of discretion by ordering the replevin of an automobile already seized under a valid search warrant issued by a coordinate court (Manila Court). The ruling stressed the importance of judicial consistency and stability.
2. **Custodia Legis**: The Supreme Court emphasized that once a property is in custodia legis (custody of the law) under a search warrant, it is protected from replevin or any other independent remedy unless the issuing court authorizes its release.
3. **Interference Between Coordinate Courts**: The decision affirmed that courts of equal rank and jurisdiction must not interfere with each other's orders to prevent judicial confusion and ensure proper administration of justice. Thus, only the Manila Court that issued the search warrant could make orders about the seized automobile.

Doctrine:

1. **Coordination Among Equals**: Courts of concurrent jurisdiction should not interfere with each other's orders, especially in cases involving seizure under lawful warrants, to avoid judicial disorder and preserve the integrity of court commands.
2. **Sole Authority of Issuing Court**: The court that issued a search warrant retains exclusive authority to make further orders about the disposition of the seized property.

Class Notes:

- **Jurisdiction and Authority**: Stress the principle that courts of equal standing should not intervene with each other's decisions.
- **Custodia Legis**: Emphasize that property held under lawful judicial processes is beyond the reach of other unrelated court orders.
- **Rules of Court**:
 - Section 3, Rule 60, allows the issuance of replevin orders but requires consideration of lawful custody claims under a search warrant.
 - Support case precedents: Cabigao v. del Rosario and Philippine National Bank v. Javellana, stressing non-interference between courts.

Historical Background:

The 1960s period featured evolving jurisprudence in the Philippines, aiming to solidify judicial integrity and consistency. This case highlights the Philippine Supreme Court's efforts to define the limits of court jurisdiction, ensuring that independent but equal courts

respect each other's decisions to foster orderly judicial processes.