

Title:

Cruz vs. Court of Appeals, 436 Phil. 641

Facts:

1. **Initiation of Action:**

- The City Prosecutor of Manila indicted Lutgarda Cruz for “Estafa through Falsification of Public Document” in the Regional Trial Court (RTC), Branch 53, Manila.
- Cruz executed an Affidavit of Self-Adjudication falsely claiming to be the sole heir of a land parcel, knowing there were other heirs.

2. **Trial Court Proceedings:**

- The civil action for damages was propagated with the criminal case as the right to file it separately was not reserved by the offended party.
- On January 17, 1994, the RTC acquitted Cruz due to reasonable doubt but resolved the civil aspect, ordering the return of the land to the rightful heirs.

3. **Motion for Reconsideration:**

- Cruz received the decision on January 28, 1994.
- On February 10, 1994, Cruz filed a motion for reconsideration (dated February 7, 1994) by registered mail, challenging only the civil aspect.

4. **Denial of Motion:**

- On April 18, 1994, the RTC denied the motion citing lack of proof of timely service to the City Prosecutor—rendering the decision final and executory.
- Cruz filed another motion for reconsideration on April 22, 1994; the RTC denied it on May 6, 1994, as it was a prohibited second motion for reconsideration.

5. **Appellate Proceedings:**

- Cruz petitioned the Court of Appeals (CA) to annul the RTC’s orders and compel it to resolve her motion.
- On March 31, 1995, the CA dismissed the petition, upholding the RTC’s rulings.

6. **Supreme Court Petition:**

- Cruz petitioned the Supreme Court to review the CA decision, focusing on proof of service compliance and jurisdictional issues regarding the land property.

Issues:

1. **Compliance with Proof of Service:**

- Whether Cruz properly served her motion for reconsideration on the City Prosecutor within the required time.

2. **Jurisdiction over Civil Aspect:**

- Whether the RTC of Manila had jurisdiction to render judgment on a property located in Bulacan.

3. **Due Process:**

- Whether Cruz was denied due process concerning the decision on the civil aspect of the case.

Court's Decision:

1. **Proof of Service:**

- The Supreme Court held that Cruz's motion was deficient as it lacked an affidavit of mailing and registry receipt. This is a "fatal defect" as per Sections 4, 5, and 6 of Rule 15, and thus, her motion was a mere scrap of paper not affecting the reglementary period for filing appeals.

- The Court emphasized that henceforth accused parties must also serve the motion on the offended party if unrepresented by private counsel.

2. **Jurisdiction over Civil Aspect:**

- The Court affirmed that the RTC had jurisdiction over the civil aspect of the criminal case, including the restitution of land in Bulacan. Jurisdiction over the criminal case encompasses associated civil issues, as per Article 100 and Article 104 of the Revised Penal Code.

3. **Resolution and Remedy:**

- The Supreme Court remanded the case to the RTC, granting Cruz five days from receipt of the decision to serve her motion for reconsideration to the offended party.

Doctrine:

- **Non-Compliance with Procedural Rules:**

- A motion failing to comply with Sections 4, 5, and 6 of Rule 15 regarding proof of service amounts to a scrap of paper and does not halt the running of the appeal period.

- **Jurisdiction on Civil Liability:**

- Criminal courts that acquire jurisdiction over the subject matter, offense, and person of the accused inherently have jurisdiction over associated civil liabilities, even for properties located outside their territorial jurisdiction.

Class Notes:

- **Key Concepts:**

- Compliance with procedural rules for motion filings.
- Doctrine of jurisdiction—including associated civil liabilities of criminal courts.
- Interaction between procedural rules and substantive justice.

- **Relevant Legal Statutes:**

- Article 100, Revised Penal Code: Linking criminal liability to civil liability.
- Article 104, Revised Penal Code: Concerning the scope of civil liabilities like restitution.
- Sections 6 & 13, Rule 13, Rules of Court: Outlining mandatory proof of service requirements.

Historical Background:

- This case reflects how procedural compliance impacts substantive justice and underlines the interconnectedness of criminal and civil jurisdictions in Philippine legal practice, shedding light on the evolving jurisprudence related to restitution and criminal court responsibilities in civil matters.