

Title: Estate of Murray Philip Williams v. William Victor Percy

Facts:

- Death of Murray Philip Williams:** Following the death of Murray Philip Williams, Branch 72 of the Regional Trial Court (RTC) of Olongapo City appointed Denis Michael Stanley as the administrator of Williams' estate on July 22, 2014, in Special Proceeding Case No. 65-0-12.
- Filing of Criminal Complaint:** On August 12, 2015, Stanley, acting on behalf of the Estate of Williams, filed a Complaint-Affidavit accusing William Victor Percy of carnapping and estafa before the Office of the Provincial Prosecutor of Olongapo City, Zambales. This complaint alleged that Percy had been entrusted with two vehicles belonging to Williams, which he failed to return.
- Denial by Respondent:** In response, Percy denied the allegations, stating that the vehicles were part of a transaction involving another individual, William James Wardle, and that he had no knowledge of the details.
- Prosecutorial Findings:** On June 30, 2016, the Office of the City Prosecutor in Olongapo City found probable cause against Percy, leading to the filing of two sets of Informations on August 22, 2016, for carnapping.
- Consolidation of Criminal Cases:** These cases were consolidated and went to trial at the RTC of Olongapo City. The prosecution presented its evidence and formally offered it.
- Demurrer to Evidence:** Percy filed a Motion for Leave of Court to file a Demurrer to Evidence, which was eventually granted by the RTC on October 16, 2018. The court found that the prosecution had failed to meet the burden of proof.
- Appeal to Court of Appeals:** Stanley, acting unilaterally and without the Solicitor General's consent, filed a Petition for Certiorari with the Court of Appeals (CA) under Rule 65, contending that the RTC had abused its discretion.
- CA Dismissals:** On April 24, 2019, the CA dismissed the petition due to faulty service on Percy and doubted its jurisdiction over his person. Stanley's motion for reconsideration was also denied by the CA on September 26, 2019.
- Petition Before Supreme Court:** Stanley sought review before the Supreme Court,

arguing procedural errors by the CA and asserting Percy had submitted to CA jurisdiction by filing a comment on the petition.

****Issues:****

1. ****Jurisdiction of the CA Over Respondent:**** Whether the CA validly acquired jurisdiction over Percy, given the petitioner's failure to serve the petition on Percy's current address.
2. ****Authority to File Certiorari:**** Whether Stanley had the authority to pursue the petition without the Solicitor General's consent, given that the matter concerned an acquittal in the criminal aspect of the case.
3. ****Double Jeopardy:**** Whether remanding the case or Stanley's actions breached Percy's constitutional protection against double jeopardy.

****Court's Decision:****

1. ****Jurisdiction:**** The Supreme Court held that the CA did acquire jurisdiction due to Percy's voluntary submission when he filed a comment on the petition, even if it didn't comply with technical service requirements.
2. ****Authority and Double Jeopardy:**** The Supreme Court denied Stanley's petition for procedural reasons — primarily, the petition lacked the Solicitor General's conformity. Moreover, any action that led to reversing an acquittal based on substantive grounds without novel procedural faults would infringe on Percy's double jeopardy rights.

****Doctrine:****

- ****Finality of Acquittal:**** An acquittal, whether through a judgment or dismissal resulting from a demurrer to evidence, is final, unappealable, and protects the accused from being tried for the same offense due to the constitutional safeguard against double jeopardy.

****Class Notes:****

- ****Double Jeopardy Elements:****
 - Former jeopardy must have been validly terminated.
 - Must be same offense in the second jeopardy.
- ****Role of Solicitor General:**** The Solicitor General exclusively represents the people in criminal proceedings before appellate courts.

- **Voluntary Submission to Jurisdiction:** Filing substantive responses, like comments, can signify jurisdiction submission.

Historical Background:

The case operates against a backdrop of procedural safeguards designed to prevent repeated jeopardy of punishment for the same offense, reinforcing judicial respect for acquittals unless essential jurisdictional flaws warrant review. This jurisprudential ethos safeguards an accused's final acquittal and due process, molding procedural and substantive criminal law practices in the Philippines.