

****Title:**** Tadeja et al. vs. People (704 Phil. 260)

****Facts:****

On May 3, 1994, during the annual fiesta of Barangay Talabaan, Mamburao, Occidental Mindoro, Ruben Bernardo was allegedly hacked to death by the Tadeja brothers (Reynante, Ricky, Ricardo, and Ferdinand) and their cousin Plaridel. Witnesses Elena and Jacinta identified them as the perpetrators. Contrarily, the accused claimed that Ruben attacked Reynante first and he was defending himself. The case began with the filing of an Information for homicide on July 15, 1994.

The trial court convicted all Tadeja brothers and Plaridel on July 15, 1997. The Tadeja brothers appealed the conviction while Plaridel absconded. The CA affirmed the trial court's decision on March 8, 2000. Subsequent petitions for review and motions for reconsideration to the Supreme Court ultimately affirmed the conviction, which became final and executory on July 26, 2007.

After Plaridel's arrest in 2006, he confessed to the killing, prompting the other accused to file for the reopening of the case based on newly discovered evidence. Despite additional affidavits supporting Plaridel's confession, the Supreme Court consistently denied the petitions, noting that the judgment was already final.

****Issues:****

1. Whether newly discovered evidence (Plaridel's confession) warrants reopening of the case.
2. Whether the finality of the judgment can be set aside to achieve substantial justice.

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

1. ****Newly Discovered Evidence:****

The Court held that the evidence presented as newly discovered did not meet the criteria required. To qualify as such, evidence must be discovered post-trial, be unattainable with reasonable diligence during the trial, be substantive, and likely change the trial's outcome. Plaridel's confession did not fulfill these conditions because he participated in the trial before absconding and his confession contradicted previous testimonies.

2. ****Finality of Judgment:****

The Court emphasized the need for finality in litigation for public policy and sound legal practice, noting that continually reopening cases undermines judicial efficiency. Citing past

practices, it underscored that once a judgment becomes final and executory, it cannot be modified except under specific exceptional situations, which were not present in this case.

****Doctrine:****

A case may not be reopened for newly discovered evidence after the judgment becomes final and executory, especially if the evidence could have been produced during the trial with reasonable diligence. The principle of finality and conclusiveness of judgments is paramount to avoid endless litigation.

****Class Notes:****

- ****Elements of Newly Discovered Evidence:**** Must be discovered after trial, unattainable with diligence during trial, material, and likely to change the judgment.
- ****Finality of Judgment:**** Judgments must attain finality for legal stability and efficiency.
- ****Alibi Defense:**** Generally weak and must prove physical impossibility to be at the crime scene.
- ****Conspiratorial Liability:**** Establish liability of all conspirators once conspiracy is proven.

****Historical Background:****

This case is set against the context of rural community life in the Philippines during fiestas, reflecting deeply ingrained familial alliances and conflicts. The prolonged legal battle highlights the challenges within the Philippine judicial system in balancing finality of decisions against new claims of innocence post-conviction. The decision reaffirms the need to respect procedural rules and underscores the judicial caution exercised in potentially re-opening settled cases.