

## THE UNITED STATES, PLAINTIFF AND APPELLEE, VS, JOSH CRAME, DEFENDANT AND APPELLANT.

*G.R. No. 4328. February 13, 1908*

Ponente: WILLARD, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-4328/>

---

### **WILLARD, J.:**

That the article complained of was libelous is not questioned. The principal point made by the appellant in his brief is that there was no proof that the article was published by him, and his argument is chiefly directed to the admission in evidence of Exhibit A, a copy of the newspaper containing this' article, of which newspaper appellant was said to be editor and publisher. The appellant claims that the copy of the paper was not sufficiently identified. This becomes of no importance because there is direct evidence from one of the typesetters of the paper that the defendant handed to him, to be set up in type, the article in question, and that the manuscript thus delivered to the witness was in the handwriting of the defendant. This was a sufficient publication within the provisions of section 5 of Act No. 277.

The judgment of the court below is affirmed with the costs of this instance against the appellant. So ordered.

Arellano, C, J., Torres, Johnson, Carson, and Tracey, JJ., concur.

**ABOUT BATAS.ORG**

# Study smarter at BATAS.org

*The Philippine bar review and law-school companion built around how your brain actually remembers.*

**The complete Philippine law library - free for everyone.**

More than 100,000 Supreme Court decisions, Republic Acts, and executive issuances - full-text searchable, browsable by category and year, and always free. No paywall, no login. This PDF came from it.

**Audio case-brief lectures.**

Any decision becomes a podcast-style lecture - facts, issues, ruling, and doctrine - with read-along highlighting and a hands-free presentation mode. Study while commuting, working out, or resting your eyes.

**Bar review built on the science of memory.**

Complete, sequenced courses for all eight bar subjects, narrated like podcasts and reinforced with retrieval practice and spaced review - the study techniques with the strongest evidence behind them.

**The full law-school curriculum.**

One subscription unlocks the entire J.D. curriculum - every subject, every lesson, with your progress tracked down to the paragraph so you can pick up exactly where you left off, on any device.

**Mock exams that tell you where you stand.**

Timed multiple-choice exams graded instantly, with per-subject score breakdowns and focus suggestions that point you at your weakest topics first.

**A study planner that keeps you on pace.**

Set your schedule and BATAS tells you every day whether you are on track for bar day - and exactly which lesson to take next.

**Start free at <https://batas.org>**

The law library is free forever - and your first lesson is one click away.

The text of this document is an official public record and remains in the public domain. Formatting, presentation, and compilation © 2026 batas.org.

Downloaded free from the batas.org Law Library. Share it freely - the library is free for every law student, bar reviewee, and practitioner.