

Title: People of the Philippines vs. Court of Appeals, Isidoro Concon and Inocencio Crisostomo

Facts:

1. **Initial Trial and Conviction:**

- On December 20, 1969, Isidoro Concon, Inocencio Crisostomo, and eight others were convicted by the Circuit Criminal Court of Manila for violating Section 3602 of Republic Act No. 1937, as amended. Each was sentenced to an indeterminate penalty and fined P10,000.

2. **Appeal to Court of Appeals:**

- All the accused appealed against their conviction, and it was docketed in the Court of Appeals as CA-G.R. Nos. 10780-82-CR. Specifically, CA-G.R. No. 10781-CR concerned Concon and Crisostomo.

3. **Court of Appeals Decision (July 13, 1978):**

- On July 13, 1978, the Court of Appeals affirmed the conviction of Concon and Crisostomo, while acquitting three other co-accused.

4. **First Motion for Reconsideration:**

- On July 31, 1978, Concon and Crisostomo obtained an extension to file a Motion for Reconsideration, and they filed it on August 31, 1978, which was denied on February 14, 1979.

5. **Second Motion for Reconsideration:**

- After receiving the denial on February 20, 1979, they filed for leave for a Second Motion, which was filed by March 7, 1979. This was denied on June 27, 1979.

6. **Third Motion for Reconsideration:**

- They filed a Third Motion (without leave) on July 27, 1979, a day after their conviction was deemed final, which respondent court denied on August 20, 1979.

7. **Fourth Motion for Reconsideration:**

- Thinking they were still within time due to a clerical notice, they moved to file a Fourth Motion on September 5, 1979. On March 14, 1980, the respondent court granted the Fourth Motion for Reconsideration, and subsequently acquitted Concon and Crisostomo on July 3, 1980.

8. **Supreme Court Proceedings:**

- Concon and Crisostomo filed a series of notices and petitions for extensions at the Supreme Court, manifesting intentions to appeal after their motions for reconsideration were denied, which were mostly filed beyond the given periods.

9. **Instant Petition:**

- The Solicitor General filed for Certiorari at the Supreme Court to annul their acquittal after it had been effected due to procedural irregularities and the alleged finality of the judgment earlier.

Issues:

1. Whether the respondent Court of Appeals acted beyond its jurisdiction or committed grave abuse of discretion when it entertained and granted Concon and Crisostomo's Fourth Motion for Reconsideration.

2. The finality of the Court of Appeals' original decision dated July 13, 1978, particularly whether proceedings after July 26, 1979, were void as the judgment supposedly became final then.

3. Whether the ruling of acquittal amounts to placing Concon and Crisostomo in double jeopardy if set aside.

Court's Decision:

1. **Jurisdiction and Abuse of Discretion:**

- The Supreme Court found that the Court of Appeals acted beyond its jurisdiction when it granted the Fourth Motion for Reconsideration. The earlier ruling had already become final on July 26, 1979, as the Third Motion was filed tardily and without leave of court.

2. **Finality of Judgment:**

- The Court ruled that the decision of conviction became final on July 26, 1979, making subsequent reconsiderations a nullity. Thus, the proceedings following this supposed finality date were void.

3. **Double Jeopardy:**

- Declaring the acquittal null and void does not place the respondents in double jeopardy, as no valid acquittal occurred. A void judgment is ineffectual, and setting it aside does not retry them.

****Doctrine:****

- Judicial finality and jurisdiction: Once a judgment becomes final, any subsequent motions or judgments extending reconsideration or affecting past judgments are void. Finality imposes a jurisdictional bar on further actions by the court.

****Class Notes:****

- ****Legal Concepts:****

- Finality of Judgment: A decision not appealed within the period set by law or upon certain conditions becomes enforceable and immune to new litigation efforts.

- Multiplicity of Motions: A court rule prohibiting multiple motions for reconsideration without express leave, aiming to ensure finality.

- Double Jeopardy: The constitutional principle preventing re-trial for the same offense, applicable only when the initial acquittal/conviction is valid.

- ****Statutory References:****

- Section 3602 of the Tariff and Customs Code: Pertains to customs violations.

- Rule 124, Section 15, Philippine Rules of Court: Bars more than one motion for reconsideration without leave.

****Historical Background:****

- The case occurred in a period when the Philippine judiciary strictly adhered to procedural rules emphasizing timely appeals and the finality of judgment to ensure stability and predictability in the legal system. This context shows a firm stance against dilatory tactics and administrative procedural errors being used to undo a final conviction.

The Supreme Court emphasized the need for judicial discipline in observing finality rules to ensure the reliability of the court's adjudicative processes and outcomes.