

**\*\*Title:\*\*** Teofilo Martinez v. People of the Philippines, G.R. No. 129364

**\*\*Facts:\*\***

- Teofilo Martinez was accused of homicide in Criminal Case No. 5753 before the Regional Trial Court (RTC) of Butuan City.
- On June 23, 1994, during trial proceedings, Martinez, represented by Atty. Jesus G. Chavez from the Public Attorney's Office, objected against his own motion to litigate as a pauper. Chavez argued the inadmissibility of a prosecution witness's testimony due to a claimed testimonial privilege.
- The presiding RTC judge allowed the witness to continue testifying and subsequently overruled the objection on July 21, 1994. A motion for reconsideration was denied on August 8, 1994.
- Martinez filed a petition for certiorari with the Court of Appeals (CA), claiming grave abuse of discretion by the RTC.
- On August 23, 1994, Martinez moved to litigate as a pauper in the CA, submitting affidavits to support his claim of indigence.
- On March 21, 1997, the CA denied this motion and ordered the payment of docket fees. A motion for reconsideration filed by Martinez was denied on October 8, 1997.
- Despite transmitting the required fee under protest, the CA dismissed the petition on November 10, 1997, citing insufficient payment. Another motion for reconsideration was denied on January 21, 1998.

**\*\*Issues:\*\***

1. Whether a motion to litigate as a pauper could be entertained by the Court of Appeals, contrary to the traditional procedural rules.
2. Whether the Court of Appeals committed a grave abuse of discretion in dismissing the case over unpaid or insufficient docket fees when Martinez was eligible to litigate as a pauper.

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

- **\*\*Issue 1:\*\*** The Supreme Court determined that under the 1997 Rules of Civil Procedure, a motion to litigate as an indigent could be entertained by appellate courts. The restrictive approach from the previous rules was not carried over.
- **\*\*Issue 2:\*\*** Reviewing the records, the Supreme Court found procedural compliance,

confirming Martinez's indigence through affidavits stating his and his family's limited income and lack of substantial property. Thus, the CA's refusal to recognize Martinez's status and its insistence on docket fees amounted to grave abuse of discretion.

The Supreme Court set aside the CA's resolutions, allowed Martinez to contest as a pauper, and remanded the case to the CA for further proceedings while ordering the return of the docket fee.

**\*\*Doctrine:\*\***

- The case establishes that under the 1997 Rules of Civil Procedure, a litigant may move to be recognized as indigent and litigate without paying fees at either trial or appellate levels, ensuring fairness and access to justice.
- The principle of procedural retroactivity is affirmed, as procedural laws effective on pending cases must be applied to align with the right to access the courts irrespective of economic status.

**\*\*Class Notes:\*\***

- **\*\*Key Concepts in Indigent Litigation:\*\***
- **\*\*Indigent Parties:\*\*** Defined under Rule 3, Section 21, allowing relief from costs under proper affidavits attesting to financial incapability.
- **\*\*Appeal without Fees:\*\*** Under procedural laws, particularly the 1997 Civil Procedure rules, appellate courts must entertain motions for indigency.
- **\*\*Free Access to Courts:\*\*** Rooted in constitutional guarantees (1987 Constitution, Art. III, Sec. 11), ensuring poverty alone doesn't restrict one's access to legal remedies.

**\*\*Historical Background:\*\***

This decision represents a shift from restrictive interpretations to more liberal applications aligned with constitutional aspirations of providing equal justice access regardless of a person's financial standing. The retrospective amendment of procedural rules reflects societal advancement towards democratizing the legal process, aiming to dismantle economic barriers in judicial systems.