

Title: In Re: Macario Adriatico – Petition for Reinstatement to the Philippine Bar

Facts:

1. Macario Adriatico was previously practicing law in the Philippine Islands.
2. On December 11, 1906, the Supreme Court of the Philippines removed Adriatico from practicing law. His license was canceled and annulled for unspecified reasons detailed in an earlier decision (7 Phil. Rep., 173).
3. Subsequent to his disbarment, Adriatico was elected as a representative for the Assembly District, including the Island of Mindoro, to both the First and Second Philippine Assemblies.
4. Adriatico's conduct as a legislator received endorsements and approval from prominent figures, including the Hon. W. Cameron Forbes, the then Governor-General of the Philippine Islands, and Sergio Osmeña, the Speaker of the Philippine Assembly.
5. Furthermore, the Hon. Mariano Cui, a judge of the Seventh Judicial District, provided a testament to Adriatico's commendable behavior.
6. A petition for the reinstatement of Macario Adriatico to the bar was filed, supported by W.A. Kincaid, a prominent member of the Philippine legal community. The Philippine Bar Association also strongly urged and recommended his reinstatement.
7. There were no objections to Adriatico's petition for reinstatement from any party.
8. Adriatico pledged to adhere to the laws and commit to upright and honest practices should he be reinstated to practice law.

Issues:

1. Whether Macario Adriatico should be reinstated to the Philippine Bar, considering his conduct following disbarment and the endorsements recommending his reinstatement.
2. The broader question of the standards and considerations regarding the reinstatement of disbarred attorneys.

Court's Decision:

1. The Supreme Court closely evaluated the positive conduct exhibited by Adriatico since his disbarment, including his responsibilities and accomplishments as a legislator.
2. The Court also considered the significant endorsements from influential political leaders and a judge, which illustrated a convincing reformation of character.
3. Drawing upon precedents from other jurisdictions that deal with similar scenarios (In re Boone, In re Treadwell, and In re King), the Court acknowledged its authority to reinstate disbarred attorneys who demonstrate genuine reformation and adherence to ethical principles.

4. Based on these factors, the Supreme Court concluded that Macario Adriatico had satisfied the criteria for reinstatement.

5. The Court ruled that Adriatico be readmitted to the bar, contingent upon taking the standard oath required of practicing attorneys in the Philippines.

Doctrine:

1. Reinstatement of a disbarred attorney can be justified upon demonstrating sincere reform, good behavior post-disbarment, and receiving significant character endorsements.

2. The judgment reinforced the notion that the legal profession allows for redemption, and a proactive attitude toward honorable conduct is crucial for reinstatement.

Class Notes:

- Key concepts: Disbarment, reinstatement, ethical conduct, character reform.
- Essential principles:
  - Reinstatement requires demonstration of reform and good conduct.
  - Judicial discretion is vital in decisions regarding reinstatement.
- Relevant citation: *In re Boone*, 90 Fed. Rep., 793; *In re Treadwell*, 114 Cal., 24; *In re King*, 54 Ohio St., 415.

Historical Background:

- The case took place during the era of the American colonial period in the Philippines, just years after the establishment of the Philippine Assembly, demonstrating an evolving judicial system grappling with local and American influences.
- Macario Adriatico's role as a legislator and his subsequent reinstatement reflected the complexities of adapting Western legal practices to the Philippine context, emphasizing personal character and integrity within the legal profession.