

****Title:**** Engineer Fernando S. Dizon vs. Judge Lilia C. Lopez, 344 Phil. 13 (1996)

****Facts:****

1. Engineer Fernando S. Dizon was convicted for the crime of falsification of a private document by the Regional Trial Court (RTC), Branch 109, Pasay City, presided over by Judge Lilia C. Lopez.
2. On April 22, 1993, the decision's dispositive portion was read to Dizon, sentencing him to imprisonment and a fine; however, Dizon was not given a complete copy of the decision immediately.
3. Dizon sought a copy of the decision multiple times, alongside his father, but it was not provided, prompting him to file a partial motion for reconsideration on May 5, 1993.
4. The hearing for this motion was scheduled on May 12, 1993, but it was not called due to the decision not being fully completed.
5. On November 29, 1994, Dizon filed an "Omnibus Motion to Annul Promulgation of Sentence and to Dismiss" the case.
6. On December 16, 1994, Dizon finally received a full copy of the decision, nearly one year and eight months after the dispositive portion was originally read.
7. The complainant filed a motion for reconsideration on December 26, 1994, and subsequently, a motion to disqualify Judge Lopez from hearing the motions due to perceived bias.
8. Judge Lopez voluntarily inhibited herself from further proceedings; the case was re-assigned to another judge.

****Issues:****

1. Whether Judge Lopez violated the constitutional provisions regarding timely rendering and promulgation of court decisions.
2. Whether the delay in furnishing the decision infringed on Dizon's right to a speedy trial.
3. Whether there were grounds for charges of serious misconduct, inefficiency, and falsification against Judge Lopez.

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

1. ****Violation of Constitutional Timeliness and Inefficiency:****

- The Court found that Judge Lopez violated Article VIII, Sections 14 and 15 of the Constitution by failing to provide a complete decision within three months after the submission of the case.
- Judge Lopez's implementation of a "sin perjuicio" judgment, initially delivering only the dispositive portion without detailed reasoning, was criticized as an obsolete practice.
- The Court acknowledged Judge Lopez's mitigating circumstances, including personal tragedies and professional challenges, attributing to her inefficiency but ultimately only reprimanded her rather than imposing harsher penalties.

2. ****Right to a Speedy Trial:****

- The Court ruled that the delay did not constitute a violation of the right to a speedy trial since the reading of the judgment in April 1993 effectively ended the trial process.

3. ****Misconduct and Falsification Allegations:****

- The charges against Judge Lopez for serious misconduct and falsification were deemed without merit as there was no evidence of malice or wrongdoing; the judgment's fine inclusion was recognized within her judicial powers.

****Doctrine:****

- ****Sin Perjuicio Judgments:**** The Court reiterated its disapproval of "sin perjuicio" judgments as they undermine the clarity and finality expected of judicial decisions.
- ****Timeliness in Decision Promulgation:**** The decision emphasized the constitutional and procedural requirements mandating that full judgments must be issued, not just the dispositive portions, within prescribed periods to fully inform implicated parties of their rights and recourses.

****Class Notes:****

- ****Elements of Falsification of Private Document:****
- Intent to cause damage.
- Alteration of a genuine document.
- Execution in a manner that it purports a truthful document when false in the aspect of its representation.

- **Constitutional and Procedural Frameworks:**

- Article VIII, Sections 14 and 15 of the Philippine Constitution impose specific deadlines on lower courts for decision-making to prevent undue delays.

Historical Background:

This case fits into the broader Philippine judicial history where procedural inefficiencies and adherence to constitutional timeframes for delivering justice have been subjects of scrutiny. The case exemplifies lingering issues in the judiciary, reflecting operational challenges and advocating for reforms aligned with constitutional mandates to maintain public trust and judicial efficiency.